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CAREER LEVEL COUNCIL

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CHAPTER 1

INTRODUCTION AND OVERVIEW

What Is the Career Level Council?

The Career Level Council (CLC) represents the interests of approximately 2,300 career level professionals GS-12 and below. It consists of 30 members elected to staggered 2-year terms from 15 regional offices, 10 headquarters operating divisions, the Office of General Council, Personnel, the Office of General Services and Controller, the Office of Organization and Human Development, and the Institute for Program Evaluation. The Council operations are administered by an executive committee which includes the Chairperson, Vice-Chairperson, and Secretary. Actual issue development is accomplished by three standing committees-- Personnel, Organization and Operation, and Special Studies. An Ad-Hoc Committee was established in fiscal 1980 to review and comment on matters related to the GAO Personnel Legislation.

The executive committee meets with the Comptroller General designee following each quarterly national council meeting and on an as needed basis to discuss issues addressed by the Council. In addition, the Council publishes a newsletter informing all GAO professional staff of its quarterly activities. At the end of each fiscal year, the Council summarizes all its activities in an annual report. The current and succeeding executive committees then meet with the Comptroller General and top level GAO management officials to discuss its contents.

The Career Level Council's predecessor, the Youth Advisory Committee, was created to respond to a 1969 Presidential directive. This document instructed each agency to create communication channels whereby younger professionals could provide input to managers. Initially, the Youth Advisory Committee dealt with issues such as recruiting, selecting, training, and utilizing career staff members. To better serve the needs of GAO and its young professionals, the Committee's coverage was expanded to include a wide range of topics affecting the Office. To reflect this expanded role, the Youth Advisory Committee was renamed the Career Level Council in 1977.

Today, with management support, the Career Level Council continues to broaden its role. In addition to addressing issues that affect career level staff, the Council provides input on decisions affecting the mission of GAO and the manner in which we accomplish our work. As a result, the CLC currently provides recommendations to top management for improving office policies, procedures, and the work environment. The Council is also available to review matters presented by the Comptroller General or other management officials.

The fiscal 1981 officers are: Robert W. Lewandowski, Chairman; Jeffrey S. Hart, Vice-Chairman; and Roberta A. Hale, Secretary. (See Appendix I for a list of fiscal 1981 national representatives.)

Selecting and Studying Issues

The Career Level Council bases its work on concerns raised, prior to the first meeting of the fiscal year, by career level staff, or on requests from management. The representatives present their constituents' concerns at the October meeting where all issues are assigned to one of the aforementioned committees. These committees consolidate, drop, or recommend to the full Council those issues which should be investigated during the fiscal year. The full Council then votes on what issues it wants each committee to undertake. These approved issues are referred back to the respective committee, which is required to prepare issues and objective statements (see Appendix V). The Council addresses other issues raised during the remainder of the fiscal year in a similar manner. (See Appendix III - CLC history and a review of topics studied by year.)

Council-Management Relations

During fiscal 1981, the Council and management both made an exerted effort to enhance their relationship. Management's interest in career level concerns has provided continued open and honest dialogue, particularly during Council participation on various organizational task forces such as the Division Operating Plans, Competitive Selection process, and the Personnel System Development Project.

This relationship was further enhanced by quick responses to our memoranda and management actions taken to address our concerns. Two such examples are: (1) delaying rank-in-person until several of the Council's concerns were reviewed; and (2) investigating job-related health and safety problems. Both parties benefited from this exchange and continued interaction will further strengthen the relationship, ultimately benefiting all of GAO.

SUMMARY OF FISCAL 1981 RECOMMENDATIONS

During fiscal 1981 we presented various recommendations to management which we felt would benefit both the career level staff as well as the organization. The following summarizes the Council's major recommendations:

- Raise the evaluator career ladder to a GS-13.
- Base GAO's pay-for-performance system on a pre-tested validated appraisal system.
- Ensure that salary increases under the new pay system are at least commensurate with that which employees would have received under the current system for satisfactory or superior work.
- Create one pay schedule as opposed to four pay levels for the new pay system.
- Define downward pay migration as an adverse action to ensure that all employee rights are reserved under the law.
- Establish a selection process for Personnel Appeals Board members which improves the consultation procedure between management and employee groups.
- Add language to GAO's Draft Order 2511.1 (Classification) to specify official notice procedures and to ensure that employees are fully aware of their appeal rights.
- Amend position descriptions of Council members to officially reflect their CLC duties and responsibilities.
- Place an employee council representative on the Appeals Board member selection screening panel.
- Omit names of all parties involved in discrimination pre-complaint counseling.
- Place greater emphasis on managing travel funds.
- Create an effective formal lateral reassignment program.
- Include carpool expenses as a part of local commuting expenses.
- Identify hazardous working conditions and take the precautions to ensure staff safety.
- Improve BARS training.
- Eliminate the development suggestions sheet as part of the BARS rating form.

- Eliminate the use of percentages in the overall assessment of job dimensions unless they are clearly shown to be a viable measure of one's performance.
- Define the relationship between BARS and the Results Oriented Appraisal Systems.
- Establish training mechanisms whereby superiors are able to provide feedback on supervisory performance.
- Provide additional supervisory training opportunities.
- Establish as soon as possible implementing guidelines for performance appraisal policies.
- Provide information periodically to all staff concerning the average time for completing job phases.
- Provide periodic variance analysis to all staff showing assignments which meet their milestones and reasons why others do not.
- Assess on-the-job technical assistance issues as early as possible.
- Verify consultant criteria, particularly when it impacts a report's message.
- Require peer review of audit programs.
- Improve coordination among GAO operating groups.
- Expand report quality measures to include report accomplishments.
- Provide PASS report score results to all staff.
- Scope congressional requests as narrowly as practicable.
- Amend the GAO evaluator classification standard and/or position description to accurately reflect the entire spectrum of duties and responsibilities of a GAO Evaluator.
- Prepare and attach an addendum to individual position descriptions accurately detailing work experiences.
- Communicate to staff how their length of service affects their ability to transfer back to Executive agencies.
- Establish a focal point within Personnel to respond to transferability questions.

CHAPTER 2

ORGANIZATIONAL CHANGE MUST BE MANAGED TO BE EFFECTIVE

The Council initially perceived organizational change to be a distinct issue unrelated to the other concerns raised by career level staff during fiscal 1981. It became readily apparent, however, that organizational change transcended and encompassed certain aspects of all the issues. The Council's efforts in this area, therefore, appear as a separate chapter, rather than a memo directed toward any one manager in GAO.

During the last few years, staff have experienced numerous and substantial changes in how we work and how we relate to each other. Teams, the subsequent return to assignment management, BARS, and the new personnel system, are examples of fundamental changes within GAO. The amount, nature, and perceived direction of organizational changes have negatively affected staff morale. Many staff also believe that recent changes in operating and personnel policies are not well planned, clearly communicated, nor consistently implemented and as a result have disrupted and delayed the completion of GAO's work. There are widely held views that continuing change is evidence of uncertainty and lack of direction within the Office.

As the Career Level Council surveyed staff during 1980 and 1981, organizational change--particularly its magnitude and sometimes unexplained nature--was clearly the overriding issue. Whether induced by external sources (i.e. congressional and OPM criticisms) or by internal initiatives, people and office systems must accommodate varying changes to policies and procedures. These pressures place a premium on the organization's and individuals' abilities to understand, cope with, and direct change. This chapter, therefore, expresses staff concerns and offers some suggestions for effectively managing change.

Staff at all grade levels are uncertain of what is expected of them. As a result, people are experiencing a sense of organizational and individual aimlessness. Although the impact of change on the quality of our work is not as easily discernible as people's attitudes, report quality may suffer since individuals are often distracted by change.

A very real crisis is the feeling of increased alienation between management and staff interests. At issue is the diminished trust and confidence staff have in management's ability to implement needed changes and its intent when undertaking others. These feelings invariably lead to one of two responses: either outright rejection of change before it has a chance to work or a laissez faire attitude of "why should I try to make this new procedure work; it will just be changed later."

Although organizational change is usually unsettling, a dynamic organization must change to meet new situations and challenges. Because of the type of work we do, GAO may even

require more change than most agencies. Consequently, whether to change is not the issue but rather how to change effectively. Many staff members believe that GAO's method of exacerbating the normal "growing pains" associated with organizational change increases the possibility of failure or limits the opportunity for achieving the desired objectives. To be effective, change must be well planned, coordinated with existing policies and procedures, adequately communicated, consistently implemented, and continually evaluated to determine its effectiveness. The following are examples cited by staff where recent changes might have been better managed.

Planning Change

Good planning is obviously the essential first step in effectively managing change. Despite our heavy use of task force planning, many people believe GAO has not adequately planned for certain contingencies. For example, congressional criticism prompted efforts to improve timeliness of reports and as a result, GAO instituted the team concept. Teams tried to blend talent throughout the agency, orient efforts to a single goal, and accomplish audit work in a timely manner. However, GAO did not anticipate some problems inherently associated with Teams. The concept substantially altered job authority relationships but not the management tasks. This unresolved problem contributed to the downfall of Teams. (See CLC 1980 Annual Report pp. 76-86 for a fuller discussion of this problem.)

Coordinating Change with Existing Policies and Other Proposed Changes

Proposed changes must be coordinated with each other and with existing policies and procedures to minimize conflicts. All too often various task forces responsible for planning change have not adequately communicated with one another, nor fully anticipated policy interactions. For example, earlier this year, based on our discussions with several officials, the Council learned that proposed merit pay policies at that time had not been adequately tied into the performance appraisal system. Management recognized the interdependence but did not fully research the concept before introducing it. As a result, the staff immediately recognized the potential conflicts that resulted from this lack of coordination.

Communicating Elements of Change

If changes are not well communicated, or understood, people are likely to resent or reject change. In the past few years, GAO management has improved its communication channels with staff but it is all too often after-the-fact concurrence rather than front-end input. As an example, the staff believes that the ramifications of GAO's personnel legislation has not been adequately

explained. Our memorandum on transferability and the evaluator title is only one of our more recent concerns with GAO's new personnel policies.

Implementating Change

Staff is of the opinion that once a policy is initiated, GAO management does not adequately provide for the all important implementation phase. For example, a perceived lack of BARS training threatens to negate its purpose. Another example is GAO's implementation of Teams--marked from the start by dissension, confusion, and condemnation. These problems probably stemmed more from poor overall direction and a lack of concerted efforts to consistently implement Team provisions than from its inherent flaws.

Evaluating Change

Evaluating the effectiveness of change requires feedback. Some staff believe that new procedures are rarely monitored to ensure their viability, once GAO decides to change. For example, BARS is a complex system, yet the CLC understands that few plans exist to comprehensively monitor this system's results. Without the monitoring effort, GAO may experience difficulties with assuring itself and its employees that BARS is being implemented consistently and fairly throughout the organization.

The above discussion has been a broad overview of managing change. Although, the new workshop, "Understanding and Coping with Organizational Change," may help people adapt to the various changes, GAO must place more emphasis on managing organizational change. With the new mood in the Congress and a new Comptroller General, change will likely remain an ever present force that needs to be recognized, understood, and directed towards improving GAO.

CHAPTER 3

FOLLOW-UP ON PREVIOUS YEARS' COUNCIL RECOMMENDATIONS

Several issues addressed in our fiscal year 1979 and 1980 Annual Reports have yet to be resolved. A brief summary of our recommendations and the status of each follows.

Uniform Career Ladder Promotion Criteria Must Be Established

Concern over the lack of uniform career ladder promotion criteria for Auditors/Evaluators has been communicated by the Council numerous times over the years. The Council continues to believe that such criteria are essential to eliminate the artificial time-in-grade promotion criteria upon which managers throughout the office continue to rely (see CLC 1980 Annual Report, page 8).

The Comptroller General stated in a November 3, 1980, memorandum to the Council (see Appendix IV) that a response on this subject was being coordinated and was expected to undergo internal review in fiscal year 1981.

The Council is aware that the GAO Personnel Systems Development Project is tasked with developing a system for determining the grade level and pay of all staff. However, the Council believes that specific interim guidance stated in terms other than a minimum or average time-in-grade is critical.

Good Assignment Planning Should Be Reinforced Through Training

The fiscal year 1980 Council recommended that management re-emphasize its support for GAO's Project Planning and Management Approach (PPMA) and reinforce this support through training in its application (see CLC 1980 Annual Report, page 14). The Council is aware that PPMA has been included as one of many topics in two existing GAO training courses. However, the Council finds that inadequate job planning remains a problem.

The fiscal year 1981 Council devoted substantial effort studying this problem. This effort resulted in a memo entitled, "More Can Be Done To Ensure Effective Planning and Staff Utilization" (see Appendix VI). The results of this study seem to indicate that the consistent implementation of a systematic approach to job planning in GAO has yet to become a reality. As a result, the Council believes that substantive training of all evaluation staff in the application of PPMA is needed now more than ever.

A Comprehensive GAO Career Planning and Development System Is Long Overdue

Last year, the Council recommended that GAO implement an office wide career planning and development system to provide

useful information on GAO career opportunities and insights to employees on how to best achieve their individual goals (see 1980 CLC Annual Report, page 27).

The Council observed that GAO managers accessible to career level staff do not have, and therefore are unable to provide, staff with adequate or consistent information on activities, experience, or accomplishments which will or will not be rewarded by the office. Managers appear to be just as confused as career level staff because of the frequent and far-reaching changes in office policy.

The Comptroller General agreed in his November 3, 1980, memorandum that career development activities in GAO were inadequate and that the Council's recommendations were both valid and realistic. He also indicated that a GAO "career planning guide" would be forthcoming. However, such a guide has yet to be distributed.

The Council sees this issue as becoming even more frustrating to managers and staff alike and recommends that specific direction from the highest levels of GAO management be agreed upon and implemented as soon as possible.

Lack of Career Tracks for Specialists Remains an Unresolved Problem

The Council expressed in fiscal years 1979 and 1980 the need for defined career tracks for specialists in GAO (see CLC 1980 Annual Report, page 37). The Comptroller General indicated in his November 3, 1980, memorandum to the Council that a Task Force report on this subject would be available for the Council's review and comment after FOD had obtained input from the regional managers.

The Council did not receive a copy of this report and, therefore, requests that the results of this study be made available so that decisions on this matter can be made as soon as possible by both management and staff.

Adjustments in the Project Team Approach May Have Been Ineffective

The Council believes that the adjustments made in the project team approach over the past year may not improve GAO's effectiveness and in fact may have a detrimental effect on career level staff.

As stated in the Council's fiscal year 1980 Annual Report (see CLC 1980 Annual Report, page 20) the Council believes that the adjustments recommended by the Division Director's Group and accepted by the Comptroller General is simply a move back to the former audit manager concept. As a result, lines of authority remain unclear, levels of supervision and review have increased, and roles of GS-12's have certainly been diminished.

The Council recognizes that management may have wanted to postpone further study of this issue pending appointment of a new Comptroller General. However, the Council believes that this issue is absolutely vital to the effective accomplishment of GAO's mission and therefore deserves prompt reconsideration.

Interrelationships of GAO Task
Forces Remains Uncoordinated and
Confusing

The Council observed in fiscal 1979 that the efforts of GAO's many task forces and study groups seemed uncoordinated and had not been adequately communicated to the staff (see CLC 1980 Annual Report, page 39). As a result, the Council recommended that GAO:

- designate a single office to maintain an inventory of all task forces and study groups, and
- advise all staff, at least semi-annually, on the progress of these efforts to address critical management issues.

Although information on some task forces and study groups is periodically disseminated in publications such as the GAO Management News, the Council believes that the interdependencies inherent among the issues being studied will not be fully recognized or understood by the staff unless management takes specific action to coordinate the efforts of these groups.

CHAPTER 4

ORGANIZATION AND OPERATIONS ISSUES ADDRESSED BY THE COUNCIL IN FISCAL 1981

The Council's Organization and Operations Committee studies issues relating to GAO's mission and objectives, management functions, administrative systems, planning, communications, reporting timeliness and effectiveness. The issues addressed by the Committee during fiscal 1981 are presented in this chapter.

More Can Be Done To Ensure Effective Planning and Staff Utilization

The Council believes more can be done to improve staff utilization thereby increasing staff morale and productivity and improving GAO's effectiveness. High morale, resulting from one's work, is particularly important to career level professionals who believe their promotion prospects are limited. The Council prepared and submitted an issue paper to the Assistant Comptroller Generals which outlined these concerns, identified some of the perceived causes, and proposed numerous recommendations to help alleviate these concerns (see Appendix VI).

Most of these concerns centered around planning and job management issues and included

- Inadequate and sometimes artificial time frames for assignment planning and scoping which may diminish report quality.
- Inadequate technical assistance early in the evaluation.
- Inadequately prepared audit programs.
- Reluctance to kill unproductive assignments.
- Inadequate coordination within GAO.
- Inadequate and sometimes artificial measures of report quality.
- A need for more specific and measurable recommendations.
- Unnecessary expansion of scope on congressional requests.

The Council polled the staff and obtained numerous examples demonstrating the effects of these problems, reviewed various related GAO manuals, staff studies, and other documents and spoke with various GAO officials responsible for job planning and approval.

The Council hopes this issue paper will stimulate a dialogue with management which will help resolve these issues.

The Staff's Ability to Transfer
Remains Substantially Impeded

The staff believes that their ability to qualify for positions in other agencies is substantially impeded as the result of two separate management initiatives which together compound the problem. These initiatives are:

- the reclassification of most staff under the "GAO Evaluator" (GS-347) qualification standard; and
- the transfer of all GAO employees from the competitive service to GAO's Excepted Service as required by GAO's Personnel Legislation.

The Council investigated the effect of each of these management actions and found that:

- The Evaluator title is vague and, therefore, may be summarily rejected by other agencies' qualification screening processes.
- The Evaluator qualification standard and individual position descriptions do not adequately nor accurately reflect the staff's duties and responsibilities and, therefore, may be rejected by other agencies' selection panels.
- The staff is generally unaware of their transferability rights.
- Some GAO Personnel Specialists are also unaware of transferability rights afforded GAO employees and as a result are unable to easily, consistently, and accurately inform individual employees of these rights.

The Council provided specific recommendations to Personnel which would help to alleviate at least some of the staff's concerns. The Council offered the following alternatives (see Appendix VII):

- Amend the GAO Evaluator classification standard and/or position description to accurately reflect the entire spectrum of duties and responsibilities of an Evaluator (for which the Council provided specific and detailed language).
- Prepare and attach an addendum to individual position descriptions accurately detailing the individual Evaluator's work experience.
- Communicate clearly to the staff how their length of GAO service affects their ability to transfer back into the competitive service (i.e., Executive agencies).
- Establish a focal point in Personnel to respond to questions and resolve problems relating to transferability.

- Provide GAO Personnel Specialists clarification of related laws and regulations so they may be better able to interpret them accurately and consistently.
- Publish in the GAO Management News an explanation of what the regulations mean for individuals joining GAO before and after October 1, 1980.

The Director of Personnel responded to the Council's recommendations in a memorandum dated May 28, 1981, in which he stated that Personnel:

- has no authority to participate in qualification determination made by other agencies;
- has prepared a statement which employees looking for a transfer may attach to their job application;
- is issuing GAO Management News articles explaining the GS-347 Evaluator series and clarifying transferability rights; and
- will provide GAO Personnel Specialists the accurate information they need to assist staff members.

The Director also defended the accuracy of the Evaluator qualification standard stating that:

- the research and development of the standard took several years;
- the first drafts of the standard were circulated throughout the office for comment;
- Divisions and Offices were permitted to exclude certain individuals from conversion if their duties warranted it;
- the Evaluator position descriptions have been "recertified" as accurate by supervisors throughout the Office; and
- only those employees who primarily perform accounting work will be classified as GS-510 Accountants.

However, the Council remains strong in its belief that the current Evaluator qualification standard and position descriptions are inherently inaccurate and that Personnel has yet to fully and accurately communicate to employees their transferability rights. The Council further believes that the Director's response did not adequately address the staff's concerns.

Supervisory Skills Should Be Developed
at an Early Stage and Continue Through
the Career Ladder

Career level staff believe that supervisory skills should be developed at an early stage and continue through the career

ladder. We base our concern on two issues: (1) sufficient supervisory training (i.e., course openings) is not available; and (2) no system exists to provide feedback on supervisory skills.

In studying these issues, we interviewed staff, reviewed information from the Office of Organization and Human Development (OOHD) on recent and planned training course changes, and spoke with division level training coordinators. Finally, we considered performance appraisal systems as a potential mechanism for rating supervisory skills. The following recommendations were presented to the Director, OOHD (see Appendix VIII).

- Individual training needs and course offerings should be well coordinated at the division level.
- Existing systems for scheduling training should be periodically examined to ensure that training is being received when needed.
- Additional courses in supervisory training should be scheduled to reduce the existing backlog, even if it requires arranging for courses at the division level.
- Performance appraisal systems should clearly delineate how supervisors receive feedback on their performance.

In response to our memo, OOHD stated that efforts will be made to supply sufficient supervisory training courses and unit specific courses are a possibility if a unit identifies a need that cannot be met by the regular course offerings. OOHD also responded that BARS contains specific supervisory tasks on which all supervisors should be rated.

Although we recognize that BARS provides a mechanism for evaluating supervisory skills we are of the opinion that the issue of providing on-the-job feedback on these skills from the supervisee should be addressed by management.

The Staff Strongly Supports Flex-time

Staff feared that the maxiflex alternative work schedule program might be curtailed, or leave accrual policies changed. We contacted officials from Personnel, Office of Internal Review (OIR), and Financial Management (FM) to determine what responsibility each had for gathering data on the flex-time program and what changes, if any were forthcoming. We learned that:

- Personnel is responsible for submitting a narrative report to the Office of Personnel Management (OPM), supported by relevant statistics and analysis of the impact of GAO's maxiflex experiment. The report was due at OPM by May 5, 1981.

--OIR is responsible for keeping the Comptroller General informed of the impact of the maxiflex program, and problems or potential problems in its implementation.

--FM is responsible for providing data on use of annual and sick leave, compensatory time, overtime, and leave without pay.

The Council was informed that management realizes flex-time enjoys widespread support among GAO staff and does not plan to change either flex-time or leave policies during the 3-year experimental period to end September 30, 1982.

We also responded to two requests during the year asking for our views on flex-time. We provided input to the Office-wide report to OPM and commented on the interim GAO Order 2620.1, which explains GAO's maxiflex program. Our responses are included as Appendix IX.

GAO's subsequent report to OPM (dated 5/4/81) said that evaluative data on flex-time was not conclusive and that a more comprehensive evaluation program would be needed to provide sound comparative data. The report did acknowledge the staff's very favorable opinions on flex-time; overall, the positive results outweighed the negative.

The Council continues to strongly support a liberal maxiflex program as being a prime contributor to employee morale and job satisfaction.

Travel Funds Are Inadequately Managed

The Council was concerned that: (1) inadequate travel fund management may result in unnecessary assignment disruptions, particularly near the end of a quarter; and (2) travel fund conditions may cause delays in initiating some very worthwhile assignments, or result in assignments being performed at inappropriate locations.

The Council surveyed the extent of these concerns in a sample of divisions and offices and found that a limited number of assignments had been turned down or seriously delayed solely because of the lack of travel funds. We did note, however, that the management of travel funds in these units is, at best, haphazard. For example, we found that units do not stress effective travel fund management until availability becomes critical. We also found that the units maintain varying types of travel fund monitoring systems.

The Council recommended that the recently established Office of Budget strongly encourage that divisions and offices place high priority on managing travel funds. We also recommended that the Office of Budget take a lead role in helping develop more effective travel fund management in GAO (see Appendix X).

In response to the Council's recommendations, the acting Director, Office of Budget, reiterated that the individual division/office has the ultimate authority to decide how it will manage and control its own funding. The Council agrees, but believes that this does not preclude the Office of Budget from developing and suggesting systems which would make travel fund management more effective throughout GAO.

Are Current Operating Plans
Addressing Problem Areas Identified
Under Teams?

Some staff were concerned that the new office operating plans may not adequately address certain problem areas first identified with Teams. The staff felt that if these problems went unresolved, GAO would continue to experience operating difficulties.

The CLC obtained most of the divisional and regional plans and analyzed them against the good management criteria set out by the Comptroller General in his "9 points" letter of September 12, 1980. The CLC also cited these and related needs in our 1980 response to the Division Directors Group. (See 1980 Annual Report pp. 78-86.) It appeared that while most plans addressed such criteria, the wording was rather general, open to differing interpretations, and could possibly conflict with one another. After full Council discussion, we agreed that it was premature to judge the relative merits of the largely unimplemented plans. We decided to include some of our concerns about job planning and direction with the larger, more fundamental issue of organizational change (see Chapter 2).

We do believe this is an area that future Councils should monitor and possibly comment on after the operating plans become more fully implemented.

GAO Project Manual Describes the
Organization's Operating Procedures

Last year the Council raised concerns that many career level staff did not have a good working knowledge of GAO's operating systems (e.g., AMPS, JSSS, PPMA, etc.). Additionally these systems often seemed to work at cross purposes, rather than in concert.

The Council provided input to the draft Project Manual, which gives a good basic description of these systems. The Manual, reflecting several of our suggestions, was subsequently published and distributed to the staff. Our recommendations can be found in Appendix XI.

Staff concerns about organizational change stem partly from perceived problems with system interfaces. (See Chapter 2 for more information concerning our comments on organizational change.) Even though the Manual partly satisfies the Council's

concerns by describing the systems, more work needs to be done to demonstrate the interrelationships of these systems.

Should Blue Books Be the
Primary Reporting Method?

Some staff members believe that GAO's emphasis on blue books as our primary reporting method lessens the effective utilization of staff and may decrease reporting timeliness and responsiveness. If managers correctly or incorrectly believe they are evaluated on the number of pages or reports produced, it is believed likely they will emphasize quantity over quality.

The CLC examined internal operating data from the AMPS system, product evaluation systems, and congressional reports on GAO report quality, timeliness, and responsiveness. Although there is some information to support these concerns, we found little factual data to prove that such problems and attitudes exist.

During the course of the year we initiated a new review looking at ways to improve staff utilization (see Appendix VI). We therefore decided to incorporate elements of the original blue book issue into the new review. The Council will also be interested in examining the findings of GAO's task force on productivity.

CHAPTER 5

PERSONNEL ISSUES ADDRESSED BY THE COUNCIL IN FISCAL 1981

The Council's Personnel Committee deals with issues such as training, performance appraisal, promotions, travel, rotation, and other personnel-related matters. The issues addressed by the Committee in fiscal 1981 are explained below.

GAO's Performance Appraisal System Has Yet to Gain Staff Acceptance and Confidence

An equitable and meaningful method of appraising performance is of utmost importance to career level staff. The staff want and need meaningful feedback to improve performance and enhance career development. However, the Council believes much more work needs to be done to gain staff acceptance of GAO's performance appraisal system before it can be truly effective.

GAO's personnel legislation requires that GAO's performance appraisal system be in place by October 1, 1981. This system combines a process portion called BARS, with a results oriented portion. BARS measures the behavior through which results are accomplished while the results oriented portion measures employee accomplishments. We have not taken a final position on the total system, but presented concerns to management.

The Council responded three times to issues regarding performance appraisal during the fiscal year. The staff questioned the large volume of paperwork and time BARS requires, and reasserted that BARS must be validated before is used as a basis for pay decisions. Following this initial input, we canvassed division and regional staff and learned of the following implementation phase concerns (see Appendix XII for memo to OOHD):

- BARS training has been inadequate.
- Development suggestion sheets should not be part of the rating form.
- Percentages used in overall assessment of job dimensions are questionable as quantitative measures.
- Implementation ratings given before the BARS process is validated should be clearly designated.
- The correlation, if any, between career ladder promotion decisions and BARS is unclear.
- The interface between BARS and the results oriented system should be more clearly defined.

The Council did not take a final position because at that time historical data was not available, there were delays with implementing the merit pay system, and OOHD was evaluating BARS implementation. Management did, however, respond to our preliminary concerns (see Appendix XII) and incorporated these into the ongoing evaluations.

The Council was also asked to respond to GAO Order 2430.1, "GAO Policy Statement on Performance Appraisal." In a memorandum to the Director of OOHD (see Appendix XII), we stated that some sections of the policy statement are so general that they provide little or no guidance. We stressed that management needs uniform criteria to make personnel decisions based on performance appraisals. This would ensure that all employees are treated fairly and consistently. We also recommended that the Director, OOHD, give priority to preparing implementation guidelines for performance appraisals and management decisions based on these appraisals.

The final input of the fiscal year regarding performance appraisals responded to the June 25, 1981, memorandum from Director, OOHD entitled "Proposed Total Performance Appraisal System for GS 7-14 Evaluators." CLC response (see Appendix XII) emphasized our previous concerns and also raised the following additional points:

- Performance appraisal in each office should be monitored to ensure that standards are being applied consistently throughout the organization and that criteria used for personnel decisions are consistent.
- Several examples illustrating a complete rating cycle would be very useful.
- Using this elaborate rating system for those temporarily not under GAO control is not realistic.

New GAO Pay System Raises Numerous Concerns

The Council was asked by the Special Assistant to the Comptroller General to comment on the concept of a Proposed Integrated Approach to Classification Performance Appraisal and Pay. On November 19, 1980, we voiced our concerns and identified several requirements that should drive the development of any new pay system. These concerns included but were not limited to the following:

- Any merit pay system should be based on a tested and proven effective results oriented appraisal system.
- Any pay system implemented should ensure that those doing satisfactory or better work would receive salary increases at least commensurate to those received under the present system.

- Any pay system should have one base pay schedule which includes all occupational categories as opposed to the four pay schedules illustrated in GAO's concept paper.
- Downward migration should be defined as an adverse personnel action with appropriate employee appeal rights.
- People receiving less than satisfactory performance appraisals should be counseled as to specific training and experience needs.
- Any individual at the upper steps of their GS pay grade whose pay falls in a higher level than their current rate should be offered the option of either moving into the higher level or remaining at their current level.
- Implementation of any system should be pre-tested and phased in over a specific period. Selected grade levels or offices/divisions could be used to test implementation feasibility, rather than imposing such significant changes office-wide.

The Council also made salary comparisons for both the competent and the outstanding performer over a 7-year period under each pay system. As compared to the current system, both the competent and outstanding performer would lose money. The competent performer would lose \$81,121 while an outstanding performer would lose \$24,783 (see Appendix XIII for details).

The Special Assistant to the Comptroller General addressed concerns raised by employee groups in a GAO Management News article dated December 23, 1980. He agreed that a merit pay system should be based on a tested and proven effective performance appraisal system. Management later decided to delay implementing of any new pay system until the performance evaluation system has been validated. They also stated that GAO planned to implement merit pay with the appraisal period beginning October 1, 1982 and ending September 30, 1983. The first payouts under the system would be in late calendar year 1983. The Council is not sure whether this allows enough time to validate the whole performance appraisal system plus gain the staff's confidence in using it as a basis for pay decisions.

The Personnel System Development Project, named on May 1, 1981, will consider the merit pay as one of its first tasks. The Council will continue to participate in developing alternative pay systems through its representative to the Personnel System Development Project.

Revisions to the Competitive Selection Process Should Be Reevaluated

The Council believes that the current Competitive Selection Process (CSP) is not the most efficient way to identify those

staff most qualified for promotion. In response to a request by the GAO Task Force on Competitive Selection, the Council made several recommendations designed to simplify and thus improve the process.

As an interim measure pending the development of a new pay system, the Council recommended that the career ladder be increased to the GS-13 level, thereby excluding these promotions from CSP, and cited the following benefits:

- The expense associated with CSP would be significantly reduced.
- Qualified candidates would be identified by those best able to do so (i.e., local management).
- Staff pay would be tied to performance in keeping with current management philosophy.

This recommendation was further supported in comparing the GAO Evaluator position with similar positions in private industry and those in other agencies already having a career ladder to the GS-13 level. However, management has since stated that sufficient work does not exist now at the GS-13 level to justify such a move.

The Council also recommended that the following points be included in any competitive selection process:

- All staff should be grouped into categories based on promotion potential and should be counseled regarding that potential.
- Promotions should be made from lists of most qualified applicants.
- Management should be able to select any qualified home unit employee.
- National panels should be convened to certify those top candidates who wish to move from one unit to another.

The Comptroller General issued a January 21, 1981, memorandum on changes to the competitive selection process. This memorandum outlined the results of the Directors' subgroup review of the CSP process and his decision on CSP. Essentially his decision was to apply the following revisions to the existing system:

- Each unit must post all vacancies every 6 months.
- Management must counsel all applicants on their competitiveness and developmental needs.
- Applicants, when preparing Form 537's, will not use job titles and must describe their experience in terms of critical job functions, such as job planning, writing ability, etc.

CLC's recommended local panel approach was viewed unacceptable by management because of concerns that such a posture may reduce movement throughout the organization.

The Council believes, however, that these recommendations are still valid and are consistent with the principal of delegating such responsibilities to line managers as discussed by the GAO Personnel Systems Development Projects staff (see Appendix XIV).

Removing Applicants' Names from Competitive Selection Process Paperwork

Some staff members believe that applicants' names should be removed from Competitive Selection Process (CSP) paperwork to further enhance the purported objective nature of the panel screening process.

The Council proposed that applicants' names be replaced with numerical identifiers. However, we found that such a move was impractical because of the need to correspond with applicants and the prohibitive cost of changing Personnel's filing systems.

As a result, the Council decided not to pursue the issue.

Excluding Carpool Expenses Causes Unwarranted Financial Burden

GAO's local travel policy, which excludes carpool expenses as a normal commuting cost, causes an unwarranted financial burden to individuals temporarily assigned to audit sites. Our constituents identified specific examples of financial hardships resulting from this exclusion. We issued a memorandum to management expressing our concerns (see Appendix XV).

According to GAO management, this exclusion was the result of causes which are currently under investigation by OIR. The CLC recommended that GAO Order 0300.3 Local Travel and Transportation be amended to permit the use of legitimate carpool expenses in the calculation of normal commuting costs.

GAO management favors our recommendation and plans to respond pending completion of the ongoing OIR review. We believe it is vital that employees be fairly reimbursed for all expenses in excess of their normal commuting costs.

Lateral Reassignment Program Does Not Work

GAO Interim Order 2335.2 does not provide the mechanism needed for a successful lateral reassignment program. In addition to no focal point existing for advertising vacancies, applicants referred through the formal system are perceived by hiring

officials as having problems or being poor performers. The informal system of direct contact and referral, management level recommendations, and even person-for-person trades, on the other hand, has proven relatively successful for several divisions and offices in arranging lateral reassignments.

The CLC, therefore, recommended that all vacancies be published in the GAO Management News, and that the informal and formal systems be integrated and aggressively supported. We also recommended that applicant confidentiality be maintained and that a list of staff interests be developed. Management informed us that the policy is being revised, but did not include our recommendation regarding applicant confidentiality. We still maintain that confidentiality is key to a successful lateral reassignment program (see Appendix XVI).

Writer/Editors and Technical Information Specialists Voice Concerns

CLC examined issues associated with Writer/Editors and Technical Information Specialists. These two groups cited as their main concerns a limited career ladder and lack of adequate training. Before CLC issued any statement on this matter, regional Technical Information Specialists and Writer/Editors met in Washington, D.C., with FOD officials to resolve these and other issues. At this time, both groups are working with FOD to resolve classification and grade level concerns. Therefore, we decided to suspend work on this issue while the groups continue communicating.

Implementing Counseling and Career Development in the Regions

On behalf of regional office constituents, the CLC looked at GAO's efforts to implement the Counseling and Career Development (CCD) program in regional offices. The Council reported that:

- The CCD program was scheduled to be implemented in all regions by May 1981.
- The Career Development component is designed for the employee to use on his or her own with the help of a pre-tested literature package.
- Counseling will be available from trained regional staff or from headquarters staff psychologists via FTS.

Because the program had not yet been fully implemented in FOD, the Council believes that any comments to management would be premature at this time.

CHAPTER 6

SPECIAL STUDIES ISSUES ADDRESSED BY THE COUNCIL IN FISCAL 1981

The Council's Special Studies Committee deals with internal Council operations and other issues designated by the Council. During fiscal 1981 this committee addressed the issues covered in this chapter.

Documenting Council Members' Duties and Responsibilities is Needed

In order to formalize Council activities, management and Council members felt it was necessary to document CLC duties and responsibilities as well as specify an amount of allowable time for Council activities. Consequently, we prepared an addendum to our existing position description which acknowledges that council members can spend up to 25 percent of their work time on Council activities. We also sent a memorandum through Mr. Pin to all Division Directors and Regional Managers describing the members' duties and responsibilities and the Council's objectives (see Appendix XVII).

Working Conditions Jeopardize the Staff's Health and Safety

Many GAO employees expressed concern over safety and health hazards encountered in their jobs. Council members gathered examples of safety problems and health hazards from the staff. As a result, the Council recommended (see Appendix XVIII) that GAO management examine nonessential risks and communicate the results and subsequent actions to all staff. Our request to investigate safety hazards in GAO was referred to the Office of Security and Safety (OSS). OSS has asked that all regional offices submit specific examples of safety hazards. Although OSS has not received any responses to date, a safety inspector has been designated to investigate examples of safety hazards in each regional office.

Proposed Application Forms May Deter Applicants

The length of GAO's proposed application form and the appropriateness of some of the questions may deter applicants. We interviewed a Personnel official regarding the proposed application form and found that Personnel has held up action on the new form pending revision by the Personnel Systems Development Project Task Force. Therefore, the Council has postponed further action on this issue.

GAO's Attrition Rate Is
Perceived To Be Understated

Because some staff questioned the accuracy of the 6 percent attrition rate published in the August 5, 1980, edition of the GAO Management News, the Council asked the Office of Internal Review (OIR) to explain how it derived that rate. We learned that the data was not readily available and in fact the attrition rate may be understated.

Because of the hiring freeze and the large number of other issues of more immediate concern, the Council decided not to pursue the matter further.

Results Of Organizational Climate
Survey May Be Reviewed By Council

The Council was asked if it would like to provide input to an organizational climate survey developed by the Office of Organization and Human Development.

We found that the questionnaire is continuously under revision, and that any questions we may have added would not highlight, to any greater degree, the concerns of the career level staff. We also decided that if we expended any Council time in this area it would best be spent reviewing survey results.

We, therefore, recommend that the resulting career level concerns be initially addressed at the local council level. Issues requiring national attention would then be considered by the full council.

CHAPTER 7

AD HOC COMMITTEE ON GAO'S PERSONNEL LEGISLATION

An Ad-hoc Committee was established by the Council in 1980 to review all GAO policies, procedures, regulations, and GAO Orders related to implementation of GAO's Personnel Legislation. The issues addressed by this committee during fiscal 1981 are covered in this chapter.

Consultation Between Management and Employee Groups Regarding Personnel Appeals Board Member Selection Needs Improvement

In the initial Appeals Board selection process, employee group input was severely limited, despite our expressed desire to participate more fully. The GAO Personnel Act of 1980 provides specifically, in section 4(a)(2)(B), that each appointment to the Personnel Appeals Board be made by the Comptroller General "* * * after consultation with organizations which represent employees of the General Accounting Office * * *." The Council, therefore, felt it necessary to pursue this issue, particularly in light of the Board vacancy occurring at the end of fiscal year 1981.

After meeting with management, we sent a memorandum dated January 16, 1981 (see Appendix XIX) detailing both the theoretical and practical bases for greater employee involvement. Management responded favorably and adopted many of our suggestions, including employee group representation on the screening panel.

On May 8, 1981, management sent out its approved process for selection of new GAO Personnel Appeals Board members, which included employee group representation on the screening panel. The panel, screening applicants for the October 1, 1981, opening, met June 23, 1981, with a CLC representative in attendance. The Council in its July meeting evaluated the panel's nominees and recommended five (see Appendix XIX).

GAO's Labor Management Relations Order Does Not Adequately Protect Employee Rights

The Council is particularly concerned with those sections of Draft Order 2711.1, Labor Management Relations which we think expands management rights beyond the scope of Title V, Chapter 71 of the United States Code and particularly those which severely curtail employees' rights in joining an employee organization.

On October 1, 1980, the final GAO Order 2711.1 incorporated only three of our suggested modifications. Moreover, we did not receive a written response to our comments or an explanation of why the basic policy expressed in the draft Order remained unchanged. Therefore, we requested that management review and respond to our earlier comments (see Appendix XX).

On January 27, 1981, we received a memorandum from management explaining the disposition of draft Order comments. We believe that the Council recommendations rejected by management would have resulted in a system more consistent with Title V, Chapter 71. The Council continues to believe that the regulations should be modified to conform with Title V in order that employee rights be adequately protected.

GAO's Classification Order Does Not
Ensure That Employees Are Fully
Aware of Their Appeal Rights

Draft Order 2511.1, Classification, does not specify official reclassification notification procedures nor does it ensure that the employee is fully aware of his appeal rights. We recommended changes and noted additional problems particularly with employee representative rights (see Appendix XXI).

On March 16, 1981, we received a memorandum from management addressing the additional problems, but it failed to address our main concerns with notice procedures and appeal rights. We were told that an employee will receive advance notice because most, if not all, classification actions are issued only after discussion with both the employee and the supervisor.

Additionally, management satisfied our concern with representation by making it a separate section and rewording it. However, management did not accept our recommendation that the employee's representative have the right to review audit procedures and results. Management said that "The employee and the representative will have familiarity with the audit procedures through discussions with the classifiers about timing, location, etc., of the planned audit. The results will be the finding of record and copies will be provided to both."

GAO's Interim Discrimination Complaint Process
Undermines the Informal Pre-Complaint Process

Interim Order (2713.2(A-81)), Discrimination Complaint Process, seriously undermines the informal pre-complaint counseling process. Chapter 1, paragraph 4(g) of the Order directed civil rights counselors to identify all parties involved in the informal complaint process. The Council believed that this disclosure negated informal complaint process benefits and recommended to the CRO Director that all such written reports omit participant names (see Appendix XXII).

The director of the CRO responded favorably to our recommendation. In his May 5, 1981 memorandum, he assured the CLC that the final Order would not require a civil rights counselor to submit any written report on the specifics of their informal counseling activities. He also noted that, if the complaint is informally resolved

"...under some type of agreement that should best be put into writing, it will be signed by the counselor, and any manager(s) or supervisor(s) directly involved in implementing the agreement. A copy would be retained by each signatory for a maximum of 120 days after which time the case will be considered closed. No copies of the agreement would be provided to anyone other than the signatories, and that includes my office."

GAO Personnel Appeals Board
Regulations for Organization
and Procedures

On March 10, 1981, the GAO Personnel Appeals Board published its interim rules for organization and procedure in the Federal Register. The Council agrees with the Board's interpretation of its own authority and jurisdiction under the GAO Personnel Act of 1980 (see Appendix XXIII).

The Council provided comments at an informal meeting with members of the Board, its general counsel, and representatives of other employee groups. These comments were also presented orally at the public hearings, held by the Board on February 26, 1981.

In the proposed rules, the Board suggested a labor relations system for GAO which parallels the Federal Labor Relations Act in the executive branch. Management's comments on the proposed rules indicated disagreement as to whether the rules governing the GAO labor relations system should be promulgated by GAO management or by the Board. Management stated that the Board had no general regulatory authority to develop a GAO labor relations program and that the board should decide through its rules if certain provisions of the GAO Order were consistent with Chapter 71, Title 5, United States Code, without further hearings or proceedings on the issue.

The Board concluded that the Congress intended that GAO management create a labor relations system "consistent with Chapter 71 of Title 5, United States Code," and that the Board establish an adjudicatory process that guarantees such consistency. Therefore, in the final rules published on July 9, 1981, the Board elected a middle ground by neither creating a system nor approving any portion of the system already created by GAO. Instead, the Board provided for an appeals system through which cases and controversies may arise to test GAO's system.

CHAPTER 8

MATTERS FOR CONSIDERATION BY FUTURE COUNCILS

The fiscal 1981 executive committee believes that the Council should continue to involve itself in the total spectrum of GAO operations. The issues which must be addressed are both generic as well as grade related issues. Specifically future Councils should

- monitor GAO's efforts to validate appraisal systems before they become the basis for pay decisions;
- review GAO's efforts to manage organizational change;
- determine if revised operating plans are alleviating the problems cited in the Comptroller General's September 12, 1980, memorandum;
- continue to question the lack of clearly defined career level tracks for specialists;
- appraise management of hazardous work situations; and
- keep abreast of any changes to GAO's personnel system.

FISCAL 1981 CAREER LEVEL COUNCIL REPRESENTATIVES

Terri Hurst	Accounting and Financial Management Division
Al Davis	Atlanta Regional Office
Maureen Driscoll	Boston Regional Office
Linda Reid	Chicago Regional Office
Bruce Fairbairn	Cincinnati Regional Office
Mary Quinlan	Community and Economic Development Division
Alice Sekanick	Dallas Regional Office
Jeff Hart	Denver Regional Office
Patrick Iler	Detroit Regional Office
Michele Rothenberg	Energy and Minerals Division
Sherlie Svestka	Federal Personnel and Compensation Division
Bill Chiplis	General Government Division
Veronica Johnson	General Services and Controller
T. J. Sullivan	Human Resources Division
Janet Greenspan	International Division
David Solenberger	Kansas City Regional Office
Robert Huston	Los Angeles Regional Office
John Hutton	Mission Analysis and System Acquisition Division
Robert Gentile	New York Regional Office
Melissa van Tine	Norfolk Regional Office
Sheila Kraus	Office of General Counsel
Steve Scheib	Personnel
Robert Lewandowski	Philadelphia Regional Office
Jerry Moriarity	Procurement, Logistics and Readiness Divi- sion
Roberta Hale	Program Analysis Division
Bob Shorrock	San Francisco Regional Office
Julie Rachiele	Seattle Regional Office
Leonard Baptiste	Washington Regional Office

CHARTER OF THE NATIONAL CAREER LEVEL COUNCIL

U.S. General Accounting Office

Revised: July 17, 1981

Approved by: Milton J. Soslow
Acting Comptroller General

Attest: Robert M. Iwanczewski, Chair
Jeffrey S. Hart, Vice-Chair
Kenneth A. Hale, Secretary

CAREER LEVEL COUNCIL CHARTER
(as amended 7/18/81)

BACKGROUND

In February 1969, the Comptroller General formally established the Youth Advisory Committee under the auspices of the Director, Office of Personnel Management. Originally, the topics discussed by the Youth Advisory Committee were generally limited to areas such as recruiting, selecting, training, and utilizing career staff members.

In an attempt to increase its effectiveness and better serve the needs of both the Office and young professionals, the scope of coverage was expanded to include a wide range of topics impacting on the General Accounting Office. In addition, the Committee was placed under the guidance of the Deputy Comptroller General commencing with calendar year 1974.

The fiscal year 1977 Committee, with the support of top management, desired to continue this trend. Therefore, to reflect changing policies and needs, and to insure the continuity of its work, the Committee (1) expanded its membership by including all professional staff regardless of age and length of service, and (2) lengthened and staggered the elected representatives' terms of office. The Youth Advisory Committee was later renamed the Career Level Council, a name more reflective of its expanded membership.

I. COUNCIL OBJECTIVES

The Career Level Council was established to provide a means for the professional staff in the General Accounting Office to express, through their representatives, their ideas and opinions on topics of interest, and to make appropriate recommendations to top management for improving the policies, procedures, and work environment of the General Accounting Office. The Council is also available to review and discuss matters presented by the Comptroller General or other management officials.

II. COUNCIL ORGANIZATION

A. Membership

1. The Council will consist of 30 professional staff members. Each representative must be a GS-12 or below at time of election. A professional for Career Level Council purposes is defined as any employee who meets the GAO definition of "professional evaluator" or "other professionals" with the exception that GS-5's who meet the organization and job series requirements will also be included.

2. The membership will include representatives of the 15 regional offices and the 15 major divisions and offices; the Personnel representative will represent Personnel, OCG, OIR, OP, OPP, JFMIP, and other individuals not otherwise represented and may be elected from any of those organizations.

3. Council representatives and alternates shall be elected for 2 year terms. At the discretion of the representative or if the representative is unable to complete his or her term, the alternate will assume the responsibilities of the representative.

4. Elections of representatives will be staggered so that each year approximately one-half of divisional representatives and approximately one-half of regional representatives will begin their terms of office. Council representative to assume office at the beginning of even numbered fiscal years shall be:

Atlanta	Kansas City
Cincinnati	New York
Community & Economic Development	Norfolk
Denver	Office of Organization & Human Development
Federal Personnel & Compensation	Personnel
General Government	Philadelphia
Human Resources	Program Analysis
	Mission Analysis & Systems Acquisition

Council representatives to assume office at the beginning of odd numbered fiscal years shall be:

Accounting & Financial Management	General Services & Controller
Boston	Institute for Program Evaluation
Chicago	International
Dallas	Los Angeles
Detroit	Procurement, Logistics & Readiness
Energy & Minerals	San Francisco
General Counsel	Seattle
	Washington

5. The representatives will be elected in either of two ways:

a. Each division and office may, at the Director's or Regional Manager's discretion, establish a local Career Level Council. The locally established council may select a representative and an alternate using any procedure which the local Council determines appropriate.

b. The division or office may elect a representative and an alternate to the National Council by general ballot of all staff meeting membership requirements.

B. Leadership

1. An Executive Committee consisting of a chair, vice-chair, and secretary shall be elected. These officers shall be responsible for administration of national meetings to include preparation of the agenda for such meetings from topics proposed by the full council, the Comptroller General, and the Deputy Comptroller General. The Executive Committee shall also represent the full Council concerning any matter to be presented to the Comptroller General or other GAO management officials.

2. The officers shall be elected annually at the last regularly scheduled meeting of the Council. These officers shall have served on the Council some time during the prior year and shall be elected without regard to geographic location, except that at least one such officer shall be from a Washington division or office. Because of its geographic location, the Washington Regional Office shall be defined as a Washington division or office.

C. Meetings

1. The National Council will meet during the second full week of October, January, April, and July, with additional meetings scheduled by the Executive Committee on an as-needed basis. Changes to the regularly scheduled meetings may be made by the Executive Committee.

2. Each of the groups described in section II (A) (2) shall be represented.

III. COUNCIL REPORTING

A. Following each National Career Level Council meeting, the Executive Committee shall distribute written minutes to the representatives and a summary report to the Deputy Comptroller General, Directors, Regional Managers and the General Counsel.

B. The Council shall prepare annually a Report to the Comptroller General, including an outline of the Council efforts and recommendations for future action.

IV. CHARTER AMENDMENTS

Amendment of this charter shall be by a two-thirds vote of all Council representatives with the concurrence of the Deputy Comptroller General.

HISTORY OF THE CAREER LEVEL COUNCIL
AND REVIEW OF TOPICS STUDIED BY YEAR

The Career Level Council (CLC) is an employee group which represents professional employees through the GS-12 level and performs a management advisory role. This Council is an outgrowth of the Youth Advisory Committee (YAC) which was established in February 1969 by former Comptroller General Elmer Staats in response to an October 1968 memorandum from President Lyndon Johnson. The President was concerned with the increasing perception of youths' alienation from society, and wanted to provide young Federal employees with an opportunity to become involved. To achieve this goal, his memorandum instructed each Federal agency or department to establish a young professional representative committee.

These committees were charged with examining:

- the extent of trainees' direct participation in designing their training programs and work assignment structure;
- the extent that these young Federal employees serve as a link between the Government and the student community;
- the availability of channels to assure that managers solicit and consider young employees' suggestions; and
- the means of increasing minority group participation in career trainee programs.

GAO's original organization (YAC) consisted of 2 management advisers and 17 professional staff members ranging from GS-7 through GS-13. 1/ They were selected by division management, and could be no older than 35. The Committee held its first meeting in March 1969 and established the following objective:

"To provide a direct method for career staff members to inform top management of their ideas for improving or implementing practices for accomplishing the purposes inherent in our system (the General Accounting Office system) for recruiting, selecting, placing, training, and utilizing career staff members."

At its inception, the Committee usually met four times per year in 2-day sessions where members expressed their personal opinions and made suggestions on pre-selected topics. Minutes of Committee meetings were at first submitted for approval to the Comptroller General and later to the Deputy Comptroller General.

Partly as a result of Committee members' attempt to expand the Committee's scope, the following changes were made:

1/GS-13 was dropped from career ladders in October 1976, excluding attorneys.

- Meetings were scheduled quarterly in 1972.
- Officers were first elected in 1972.
- The charter was rewritten in 1974.
- The role of the YAC was gradually broadened between 1971 and 1974
 - to allow YAC members to choose the subjects for discussion,
 - to study the subjects in greater depth, and
 - to offer solutions rather than just raise issues.
- The YAC agreed to replace the minutes to the Deputy Comptroller General with the Annual Report in 1975. The Annual Report was first issued in 1976.
- The YAC changed its name to the Career Level Council (CLC) to reflect its broader role in 1977.
- The CLC participated in several task forces, including the Career Management System Task Force in 1977.
- The first CLC Newsletter was issued in 1978.
- The Comprehensive Bylaws were adopted in 1979.
- The Council testified on the GAO Personnel Legislation in 1979.
- The Annual Report was first addressed directly to the Comptroller General in 1981.
- The Council Charter and Bylaws were rewritten and reorganized in 1981.

Review of Topics Studied By Year

The listing of a topic does not indicate the depth of the YAC/CLC study or what recommendations, if any, were made. Under its early discussion-group format, the Committee issued few reports. Therefore, topic discussions may not have been documented fully. Furthermore, since any substantive information was in minutes of meetings, and meetings were not held regularly, we cannot be certain our list is complete.

Fiscal 1970-71 (including February-June 1969)

1. Career Counseling--identified lack of professional development coordinator in some regions/offices; discussed problems with career counseling.
2. Identified failure to communicate promotion programs.
3. Discussed effectiveness of recruiting programs.
4. Discussed effectiveness of staff evaluations.
5. Recommended mechanisms for improving quality and timeliness of jobs.
6. Discussed using audit technicians (upward nobility program).

Fiscal 1972-73

1. Suggested GAO improve its recruiting brochure.
2. Continued work on ratings/appraisals/counseling.
3. Participated in Comptroller General Task Force on Upward Mobility.

Fiscal 1974

1. Discussed promotion criteria in the regions/offices/divisions.
2. Discussed criteria for ratings as tied to promotions.
3. Reviewed division/office travel procedures.

Fiscal 1975

Note: YAC held only three meetings in fiscal 1975 because travel funds were tight. One of these meetings was limited to Washington staff.

1. Reviewed promotion policies and procedures; time-in-grade criteria.
2. Reviewed ratings and the lack of standard criteria; inadequate counseling.
3. Recommended improvements in recruiting--improving information on job responsibilities and travel.
4. Commented on travel policy--weekend return; commented on revised policy.
5. Concluded that training policy was not uniform; recommended improving fund allocation by office/division/region.
6. Reviewed first year orientation and work--relevancy of orientation, diversity and the opportunities available in first two years' assignments.

Fiscal 1976

1. Reviewed utilization of upper-level hires.
2. Discussed appropriateness of rating forms. Commented on proposed GS-7 to GS-13 performance appraisal and promotion potential system.
3. Continued work on recruiting and orientation.
4. Reviewed internal operating policies and objectives--development, communication, and application.
5. Recommended procedures for information on employees' requests.

Fiscal 1977

1. Reviewed employee training and development and noted lack of uniform training and implementation.
2. Recommended implementation of career ladder promotion criteria.
3. Continued work on travel policy--weekend return.
4. Reviewed issues associated with the work environment--local awards program; rotation between headquarters divisions and offices; flexible working hours.
5. Discussed council legitimacy. This was an issue either officially or unofficially addressed each year. However, attention it received this year was particularly strong.
6. Provided a representative to the Career Management System.

Fiscal 1978

1. Reviewed division/office data on training.
2. Recommended liability protection insurance be provided for employees while using Government cars.
3. Provided representative to Rewards Task Force; reviewed merit award distribution.
4. Recommended policies for improving agency effectiveness--TEAMS questionnaire; BARS; PPMS.
5. Reviewed the access, disclosure, and disposal of GAO personnel files.
6. Reviewed employee suggestions awards program--lengthy disposition time, etc.
7. Reviewed regional assignment systems relating to job planning and staff assignments.

Fiscal 1979

1. Commented on Revised Single Agency Series; OIR Study on Competitive Selection; CSP Task Force issue papers; GAO Personnel legislation.
2. Participated in GAO's Task Forces and Study Groups.
3. Reviewed TEAMS.
4. Reviewed Career Management System.
5. Reviewed Career Placement Program.
6. Conducted Health Care Plan Analysis.

Fiscal 1980

CLC made the following recommendations to management:

- Career ladder promotion system--develop and implement standards for career ladder promotions.
- Competitive selection for career ladder vacancies--require selection panels to be composed of people with knowledge of the subject matter related to the vacancies.
- Competitive selection paperwork--establish regional depositories with the same paperwork submission dates as headquarters.
- Training--1) eliminate \$300/semester limit on evening college courses and replace it with a yearly maximum ceiling, 2) seriously consider training travel funds allocations when funds are limited, and 3) provide consistent PPMA training.
- Disciplinary offenses and penalties--uniformly administer disciplinary actions and establish guidelines for managers.
- Computation of Competitive Selection Scores--insure adherence to certification scores validation procedures.
- Subteam leader titles and roles--drop the supervision requirement for subteam leader designation.
- Rotation policies--1) include overseas returnee who are above GS-12 in the 20% outside promotion requirement and 2) consider reinstituting a field/headquarters rotation program.
- Maxiflex program--define abuses and disciplinary actions available.

CLC also commented on 1) the Division Directors' Group paper on Teams and 2) the first draft regulations implementing GAO Personnel Legislation. Further, Council members developed a Council history and discussed the following issues:

- GAO evaluator series,
- Career planning and development, and
- Specialist career tracks.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

NOV 3 1980

TO : Chair, Career Level Council - Bob Lewandowski

FROM : Comptroller General

Thomas R. Smith

SUBJECT: Career Level Council Annual Report for Fiscal Year 1980

This is to follow up on the discussions during our meeting of September 23 concerning your annual report. I enjoyed the opportunity to meet with you and your Executive Committee and I find this type of discussion to be very helpful.

Near the end of the meeting you expressed some concern about the amount of time you recently have been required to devote to CLC activities and asked if there were some way we could remind supervisors of management's support for such efforts. In response to this request, I issued a memorandum to heads of divisions and offices describing my views. I trust you will advise me or appropriate management officials if you encounter any problems.

The following is intended to expand upon the matters we discussed at the meeting. As reflected below, some of the items are still under consideration and any further comments you care to offer will be considered during the decision-making process.

Proposed Auditor/Evaluator Career Ladder Promotion System

Feedback from management and staff on the May 22, 1980, proposal dealing with this promotion system is still under active consideration. A systematic response is being coordinated by Bill Beusse, Special Assistant to the Assistant Comptroller General for Administration. That response is expected to start internal review later this year. Consequently, any response at this time to questions raised about this promotion system would be premature.

Competitive Selection Procedures for Career Level Vacancies

The new procedures, which the CLC favored, were adopted as described in Personnel's proposal with the exception that the minimum notice period will be retained at 2 weeks rather than reduced to 10 calendar days as had been originally proposed.

Competitive Selection Process for GS-13 and Above

At my request a Division Director's subgroup has been formed to study the current procedures and report back to me with recommendations.

Training

I am sympathetic to your concerns about the shortage of travel funds. As a result, in FY 81, three courses, Conducting Program Results Reviews, Auditing and Job Management Skills and Program Evaluation, will be offered in field locations. In addition, while the Entry Level Training is scheduled only for Headquarters, we have proved our ability to take courses to the regions when travel funds are limited.

Copies of the new catalog and schedules for the audit and professional staff core curriculum are available from the Training Branch.

Table of Disciplinary Offenses and Penalties

Comments have been received in Personnel from all parties concerned, and are presently being assembled and reviewed. There are inconsistencies in the proposal which we are in the process of rectifying. CLC's comments on this draft were very helpful.

Evaluator Series

Many of the issues cited in your report have been addressed to some degree in recent editions of the GAO Management News (e.g., April 8; April 15; May 6 and August 12, 1980). Consequently, the responses contained in this memo should be interpreted as an elaboration of the responses previously given.

Issue 1: What effect does the proposed evaluator qualification standard have on the ability of GAO evaluators to obtain positions in other agencies?

There is no reason to believe that ability to transfer to other agencies will be significantly compromised by the proposed evaluator standard. That is, the primary qualifications of applicants will continue to be their education/training and work experience relative to the specified job requirements of the Job Opportunity Announcements (JOA's) of executive agencies. The SF-171, Personal Qualifications Statement, requires information that directly focuses on these primary qualifications for a given JOA. Thus, if an applicant has the training and work experience required for "auditor" positions in other agencies, then he/she still will be a qualified candidate regardless of the "evaluator" title used in GAO. If, in contrast, he/she couldn't meet those JOA requirements--even if classified as a GAO "auditor"--then he/she probably wouldn't remain a viable candidate anyway when the selection process in the other agencies advances beyond preliminary stages. In summary, it is the substance of one's qualifications--not how one is labelled--that primarily determines one's relative ability to compete regarding a particular JOA from another agency.

Issue 2a: What effect will the ambiguity of the "evaluator" title have on the ability of GAO staff to obtain CPA certificates in other states?

Requirements for CPA certificates differ among states. Each state, however, generally requires evidence of appropriate education/training and accounting experience in order to establish eligibility for the CPA examination process. Thus, the series title is clearly not the primary determinant of CPA eligibility. As a result, even GAO "auditors" without the required education/training and financial auditing experience probably would be ineligible to start the CPA examination process in most states. Moreover, even if such "auditors" were eligible, it is highly unlikely that they could complete the examination process successfully, regardless of whether GAO called them "auditors" or something else. In contrast, GAO "evaluators" who can document that they have the required education/training and financial auditing experience should have no inordinate difficulty in establishing eligibility for the CPA examinations and completing them successfully.

Issue 2b: What effect will the ambiguity of the "evaluator" title have on GAO's image within the Federal Government?

This is difficult to answer accurately because "image" is a highly subjective term. Ultimately, however, the image of GAO probably will be advanced by the new series title because "evaluation" generally implies a greater scope and depth in the assessment of an agency than "auditing." That is, besides addressing the relevant financial/economic issues, "evaluation" generally also connotes that appropriate emphasis is given to issues of legality, efficiency, and effectiveness--which are often conceptualized or measured in non-monetary terms. In contrast, "auditing" to many people connotes a strictly financial/economic orientation. Thus, GAO's image realistically can be expected to benefit from the new series title because it connotes that GAO's primary mission of assessing executive agencies is performed in a more comprehensive and in-depth manner.

Issue 2c: What effect will the ambiguity of the "evaluator" title have on the recruitment of accountants for evaluator positions?

GAO will continue to have a need for employees with accounting backgrounds and will recruit for accountants to meet that need. The classification review, now underway in the divisions, is expected to result in the identification of the extent of need for accounting knowledges and skills in each division. Positions will be established and career ladders identified for recruitment and career progression purposes. Existing staff in accountant positions and in evaluator positions who have accounting backgrounds and credentials will be able to compete successfully in promotion competition and other career progression within the evaluator series.

Issue 3: Why is the conversion process and its effects on the staff still undefined?

The conversion process, as well as anticipated effects on the staff, have been chronicled in a series of articles in the Management News (e.g., April 8; April 15; May 6; and August 12, 1980; the last three articles are especially informative regarding the administrative mechanics and related empirical issues). If you want elaboration on any aspect of the conversion process and its foreseeable implications, please phone David Thompson, Chief, Position Classification and Compensation Branch, 275-6128. Realistically, there is hardly more that management and staff could have done about distributing relevant information on this subject.

Issue 4: Why has there been a continued lack of communication about the evaluator qualification standard from management?

Determining the competencies (knowledges, skills, and abilities) required to meet the evaluator qualification standard for various grade levels necessitates an accurate and equitable specification of tasks to be performed at each level. This is a complex undertaking that, overall, requires an extensive developmental effort. The preliminary results and general progress of this effort now have been advanced to the point where recent publication of the following GAO documents was warranted: (1) Audit/Evaluator Tasks and Related Competencies, CMC Task Force, August 1980; and (2) Task Standards Summary for GAO Auditor/Evaluators, CMC Task Force, August 1980.

Issue 5: What impact may the evaluator qualification standard have on other personnel-related subsystems such as BARS, CSP, and Teams.

A major objective of the management and staff working on implementing GAO's personnel legislation and requirements of the CSRA is to ensure that all major subsystems will be functionally compatible with each other. To this point, the evaluator qualification standard has posed no significant conceptual or empirical problems in terms of causing undesirable impacts on, or potentially being incompatible with, other major personnel subsystems.

Travel

OBFM has issued a new Local Travel Regulation 0300.1.

Career Planning and Development

The Council is correct in stating that the career planning activities in GAO are not adequate. Furthermore, your suggestions for a comprehensive career planning system are valid and realistic yet the report fails to mention the career development systems already in place for individual employees such as the Career Resource Center and individual career counseling available through the Counseling and Career Development Branch.

In addition, many other divisions besides FOD are formalizing career development systems with the input of career development orientation for managers which will instruct representatives from all interested GAO divisions in both career development philosophy and career development implementation procedures. The end product of these workshops will be a career planning guide which will include adequate information on career opportunities within GAO.

Sub-Team Titles and Roles under Teams

I recently announced, by a memorandum to all employees dated October 22, 1980, position titles to be used for Evaluator positions. Taken in conjunction with my memorandum of September 12, 1980, to all GAO professional employees in which I announced that the team approach would be a method, rather than the method, of performing our work, I believe that the issue of lack of consistency in assigning the title of sub-team leader is moot.

Rotation Policies

Rotation from Overseas Branch - ID returnees are counted against the 20 percent requirement if they return to a division/region other than the one they left.

Rotation between FOD and Headquarters - The CLC is correct. It will be some time before we have field rotation again.

Maxi-Flex Program

GAO Order 0812.1, GAO MaxiFlex Alternative Work Schedules Program, is currently being reviewed by OIR and OBFM.

Career Track for Specialists

The FOD Task Force has issued its final report to the Director of FOD for study and implementation. It was an agenda topic at the recent Regional Managers' Conference.

Copies of the report will be given to Regional Managers for review and comment prior to decisions being reached on an implementation plan. At that time, FOD Headquarters management has informed me that the report will be made available to the CLC for your review and comment as part of FOD's final review process.

I hope this information is helpful to you and that we can continue to move forward in a cooperative effort to improve the quality of work life for all GAO employees.

CAREER LEVEL COUNCIL

FY 81

ISSUES

BACKGROUND

The purpose of the Career Level Council is to provide a means for General Accounting Office professional staff to express, through elected representatives, their opinions and concerns. It also provides a mechanism to recommend changes, where appropriate, to improve office policies, procedures, and work environment.

The Council consists of 28 professional staff, GS-12 or below, which represents 15 regional offices, 10 HQ's operating divisions, the Office of General Counsel, Personnel, and the Office of General Services and Controller.

During the Council's initial meeting of the fiscal year, issues are presented, discussed, slotted to a particular operating committee and approved for consideration by the full Council. The following identifies each committee, provides a brief explanation of the matters the committees were designed to address, and the issues/objectives the Council has selected to address during fiscal year 1981.

Organization and Operations Committee

This committee deals with planning, management function, communication, timeliness, effectiveness, office mission and objectives, administrative systems, and any other identified organization and operations issues.

FY 81 Issues

1. Issue: Staff feel overwhelmed by the accelerating, continuous, and largely unexplained rate of change within the General Accounting Office. Many systems are being changed, often with little explanation or discussion of the purposes and hoped for results. There are questions concerning who, if anyone, is managing or monitoring change.

Objective: Obtain and review GAO's "master plan" referred to by Mr. Fee. Recommend that management provide the staff better explanations of the purpose(s) of specific changes and how such change furthers the overall objectives of the office.

2. Issue: Allowing each region and division to develop their own operating procedures may not resolve many of the problems experienced under teams; e.g. two bosses, confused authority and responsibility lines, inconsistencies of approaches.

Objective: To determine the extent to which divisions operating plans work to alleviate previously identified problems and/or cause other unanticipated problems and provide management with appropriate recommendations.

3. Issue: Proposed and new systems such as BARS, results orientation, and merit pay require extensive supervisory skills which may not be adequate to effectively meet system objectives. Supervisory skills are not currently emphasized on performance evaluations nor are they developed as people progress through the organization.

Objective: Review current systems with an eye towards identifying demands placed on supervisors and provide management recommendations designed to better meet those needs.

4. Issue: Employees are concerned that flex time may be curtailed, even though it has been a tremendous boost to staff morale.

Objective: Determine what type of conclusions are being drawn by management about flex time. Determine if there are plans to reduce annual leave benefits as a condition to its continued use.

5. Issue: Inadequate budgeting of travel funds within the regions has disrupted and delayed assignments, and in some cases assignments have been turned down. It appears that job objectives are molded by the availability of travel funds not the job itself.

Objective: Determine how travel funds are budgeted and allocated. Provide management with recommendations designed to improve the process.

6. Issue: Many staff feel that the title evaluator has locked them into the General Accounting Office. This locked-in syndrome is heightened by GAO leaving OPM's umbrella and establishing its own pay system.

Objective: To determine the impact of these major changes on transferability. If research proves these to be significant potential problems, we will provide management with appropriate recommendations.

7. Issue: Career level staff believes that GAO overemphasizes blue books as the method of delivering our message. We further believe that this emphasis has increased job costs and may have hindered our effectiveness.

Objective: Determine the extent to which GAO has tried to emphasize timeliness and responsiveness rather than number of blue books issued. Suggest additional steps which might be taken.

Personnel Committee

This committee deals with such matters as training, promotions, travel, work environment, rotation, and any other identified personnel-related issues.

1. Issue: The staff is not convinced that BARS justifies the large volume of paperwork and time the system requires. BARS training is confusing and does little to assure the staff that the system can be a valid basis for merit pay decisions. We also believe that BARS must be thoroughly tested and proved before it is used as a basis for merit pay decisions.

Objective: Obtain feedback from the staff on the implementation of BARS at the division/office level. This feedback will be the basis for identifying potential problems and recommendations to improve the system.

2. Issue: The staff believes that to provide greater objectivity applicant's names should be removed from CSP paperwork before it goes before a panel.

Objective: Determine what barriers may exist to replacing names with numerical identifiers. Provide management with recommendations designed to overcome any identified barriers.

3. Issue: Specialists in GAO believe that they have some unique concerns which are not receiving adequate attention. Specifically, they question the applicability of BARS, they remain unsure of their role in FOD, they see a lack of relevant internal training opportunities, and do not understand the reasoning for a career-ladder different than that for generalists.

Objective: Gather relevant information on the unique concerns of specialists and provide recommendations to management.

4. Issue: Local travel guidelines (GAO Order 0300.3) do not adequately reimburse staff for additional costs they incur when official duties prevent them from traveling to/from work in an established carpool.

Objective: Persuade management to revise the order to expand the definition of normal commuting costs to include costs associated with carpooling.

5. Issue: Some staff believe that there is an inadequate number of slots for supervisory training and that course dates are changed with insufficient notice preventing many from attending.

Objective: Determine the extent to which this is a problem and provide appropriate recommendations.

6. Issue: Staff who have expressed interest in lateral re-assignment do not believe that they are being given adequate consideration.

Objective: Determine how such requests for reassignments are processed and provide appropriate recommendations to improve the process.

7. Issue: FOD staff are unsure as to how the Counseling and Career Development Branch in headquarters interfaces with the regional offices. They are unsure as to exactly what services are available and how to go about getting them.

Objective: Determine what the interface is and request that such information be provided to all FOD staff.

Special Studies

This committee deals with Council operations and other issues as designated by the full Council.

1. Issue: Career level staff have experienced:

- poor working conditions; e.g. too hot/cold, poor ventilation;
- hazardous waste locations, e.g. employees have been robbed and beaten; and
- assignments which jeopardize staff safety, e.g. prison assignments which question judicial decisions and create animosity between prisoners and the career level staff.

Objective: Point out to management that hazardous working conditions exist and need to be corrected.

2. Issue: The staff is concerned with current attrition rates and potential attrition rates. The eight percent attrition rate published in a recent Management News appears low when one considers the amount of staff discontent.

Objective: Seek an explanation of the statistics and determine if attrition costs are analyzed by the organization.

3. Issue: The staff is concerned that the new Application Qualifications Statement is cumbersome and may not be a valid measure of an individual's qualifications.

Objective: Review the Applications and suggest revisions.

4. Issue: Recognition of CLC duties and responsibilities.

Objective: Develop a position description.

5. Issue: Request by Mr. Frank Fee to assist Mr. Lowell Owens in developing a quality of life questionnaire.

Objective: Provide input and assistance to Mr. Owens.

Ad Hoc Committee

This committee was established last fiscal year to provide comments on the regulations designed to implement GAO's legislation. It will continue in the capacity this fiscal year. Specifically, it will review the:

- revised EEO draft order;
- draft regulations concerning: Personnel Management; Labor Management; Status, Tenure and Probation; Recruitment and Selection through Competitive Examination; Qualifications Requirements (General); and Suitability;
- Personnel Appeals Appointments and the Council's Input to this Process;
- draft regulations dealing with the Employment of Relatives;
- interim GAO orders; and
- draft GAO regulations concerning: Qualifications Requirements (Medical); Reduction of Force; Noncompetitive Position; Employment of Experts and Consultants; Selective Placement Programs; Veterans Readjustments Appointments; and Power of Appointment and Removal.

MORE CAN BE DONE TO ENSURE
EFFECTIVE PLANNING AND STAFF UTILIZATION

Issue Paper

U.S. General Accounting Office

Career Level Council

July 1981

MORE CAN BE DONE TO ENSURE
EFFECTIVE PLANNING AND STAFF UTILIZATION

INTRODUCTION AND SUMMARY

The Career Level Council believes that job planning can be improved and some of GAO's evaluative resources could be better used, thereby increasing GAO's effectiveness and improving staff morale and productivity. High morale concerning one's work is particularly important to career level professionals who believe their promotion prospects are limited.

This issue is not an easy one. The tradeoffs among methodologies, timeliness, reporting requirements, cost, and potential accomplishments are not easy to make. However, all affect how the evaluation is conducted, and the decisions made about each affect the staff and their perception of the importance of their work.

The attached issue paper presents some staff concerns and recommendations which the Council believes will improve GAO's effectiveness and staff morale. We offer examples that demonstrate these concerns (though specific assignments are not identified), and identify at least some of the causes which prompted these concerns. Our discussion is generally limited to GAO's planning and job management process and centered on the following problems.

- Inadequate and sometimes artificial time frames for planning and scoping which may diminish report quality.
- Inadequate technical assistance early in the evaluation.
- Inadequately prepared audit programs.
- Reluctance to kill unproductive assignments.
- Inadequate coordination within GAO.
- Inadequate and sometimes artificial measures of report quality.
- A need for more specific and measurable recommendations.
- Unnecessary expansion of scope on congressional requests.

The Council found that the utilization problems discussed in this paper occur because of system and personnel deficiencies. This paper concentrates on the Office's system problems. Modifying the system will only eliminate some of the staff utilization problems. To solve the rest, senior management must hold those staff members who are responsible for assignments accountable for work results.

The Comptroller General also strongly emphasized planning in his introduction to GAO's guide to Project Planning and Management (PPMA), which states, "Good project planning and management facilitates the efficient use of resources and timely delivery of results. These, in turn, directly impact on both the effectiveness of individual assignments and GAO."

The Council acknowledges that the issues discussed in this paper are not new. Though the staff is proud of the generally high quality reports GAO produces, it is also frustrated by the more frequent occurrence of poorly planned jobs. We also recognize that the perspective from which our constituents may view an assignment differs from that of middle or upper management. An assignment which our constituents may consider a "turkey" may be perceived as a "golden eagle" by management or others reading the report. Our constituents are becoming more discouraged, however, by the increasing occurrence of poor planning, wasted staff days, and undeveloped issues. The Council hopes this document will stimulate a dialogue with management which will help resolve these issues.

The last two sections discuss this report's objectives, scope, methodology, and recaps the Office's current systems for ensuring effective planning and staff use.

The following sections further develop our concerns, provide examples of specific job problems, and offer some suggestions which may help to alleviate some of these problems.

ARBITRARY TIME FRAMES CREATE
STAFF FRUSTRATION AND MAY
DIMINISH REPORT QUALITY

In too many instances budget constraints for assignments are arbitrary and do not reflect the most realistic estimates of when the work can be completed. This pressure to complete assignments within budget occurs in part because of SES contract requirements. This often results in a lack of planning which may affect the quality of the report in two ways: (1) extend the publication date, possibly rendering the report obsolete; or (2) deny needed implementation time, by deciding to publish within the established time frame. Either development causes serious morale problems and may arbitrarily limit the job's scope.

Examples

We present several examples to illustrate the consequences of arbitrary time constraints.

--Council constituents in one region stated that many assist evaluations (10 of the 12 discussed) programmed into the region were of poor quality, primarily due to inadequate time for performing the initial planning/scoping work before it was sent to the region, and inadequate implementation time frames.

--Some operating divisions mandate specific times for completion of all assignments or portions of assignments such as the planning/scoping phase. Some of our constituents believe that this emphasizes cutting the planning/scoping time frames, which they regard as inefficient since fewer people are involved in the assignment at that stage and changing audit objectives is much easier that early in the job. While such constraints can encourage concerted efforts, they can also hinder thorough planning.

The OPP briefing paper also discussed examples where artificial constraints led to excessive overruns.

--In two jobs we found that artificially established time constraints led to excessive overruns. In one case, the team knew before starting the job that it would take over 2,000 staff-days. To avoid "looking bad," and because they knew the division would not accept the estimate, they did not reduce the job's scope, but asked for only 1,600 staff-days. The job ended up costing 2,200 staff-days. In the other job, essentially the same situation occurred. The team knew that the job would be big and require 2,000 staff-days. As there were no deadlines set by the customer, the division permitted the job to grow during implementation. As a result the final staff-day usage was three times the original authorization.

Recommendations

Specifically, the Council recommends that management provide:

--Information to all staff on a periodic basis concerning the average time for completing job. This information can then be used in planning and justifying job completion dates. Such reports could be obtained semi-annually through existing data bases.

--Periodic "variance analyses" to all staff which show proportion of assignments which meet their budget and then evaluating the reasons for those which do not. Management should determine which of these reasons are acceptable. This process could be similar to the "Lessons Learned" paper published in 1974 or the recent OPP paper. Such reports and discussions should be held at least annually.

TECHNICAL ASSISTANCE MUST BE PROVIDED EARLIER

Technical assistance should be provided and planning for its use on an assignment completed before beginning implementation. When an assignment's technical assistance issues are not considered and removed early in the job, the possibility that completion will be delayed increases, the ability to use advanced analytical techniques decreases, and the possibility of applying faulty analytical methodologies increases. Needed technical assistance

may include, for example, using in-house expertise to assist in statistical sampling, information retrieval from computerized data bases, or outside consultants or experts.

Examples

Council constituents provided several examples of assignments in which providing technical assistance earlier would have been especially useful.

- A specialist provided criteria which apparently were not verified by other experts. After the implementation phase was nearly completed, the specialist disavowed his criteria. However, the audit staff was told to issue a report with the remaining material. This was a large evaluation (i.e., over 1,000 staff days), resulting in a lengthy report with only a few substantive recommendations.
- Implementation started before the technical assistance issues were resolved or the assurances of experts availability provided. This large assignment was delayed over one year and doubled in the number of staff days expended.
- Statistical samples were improperly prepared, resulting in a substantial waste in evaluators' resources. Examples of improperly prepared samples included: using a faulty universe and not properly weighting a stratified sample before projecting it to the entire universe, and preparing a sample without consulting with technical assistance staff--all the sample work was discarded.
- Using a questionnaire without properly understanding all of the issues and objectives to be discussed in the final report.
- Using a data collection instrument before reporting objectives were established. Ultimately the staff had to request additional information.

IPE representatives responsible for providing technical assistance agreed with our observation that assistance was often not requested or provided early enough. Technical assistance problems were also cited in OPP's recent briefing paper. For example;

- On one assignment, insufficient analysis was given to determine the staff-days needed to develop the essential data base on which the report hinged. The team muddled through several problems until the data base was finally developed. Consequently, the first draft was submitted 20 months late and the report was issued 22 months after the original estimated completion date.

- On another assignment, several months were lost due to the loss of a key staff member. The team was not able to minimize the impact on the job, mainly because no one developed the experience to do the technical work started by the departing staff person.

Recommendations

The Council recommends that:

- Technical assistance issues be fully assessed as early in the evaluation as possible, and most definitely before the implementation phase is approved.
- Consultants responsible for developing criteria needed for supporting the report should have their work verified before substantial audit resources are committed.

AUDIT PROGRAMS NEED IMPROVEMENT

Audit programs prepared for large multi-region evaluations may not be comprehensible to a new audit staff who did not work on the scoping/planning phase of an assignment. A related concern is the staff's inability sometimes to relate the overall evaluation objectives to specific audit steps. These concerns correspond to some of those discussed in the OPP paper dated February 17, 1981. Generally, the concern is that the programs request far more information than that ultimately included in a report and may not reflect appreciation of the local conditions. As illustrated in the following examples, this can result in substantial amounts of additional and largely unnecessary field work.

- The audit objectives and work steps did not apply to the site selected. If the audit staff with the expertise quickly reviewed the job, they should have identified this problem. Thus, several hundred staff days spent preparing work papers and summaries not used in the final report would have been saved.
- The audit program was prepared by a new employee, an upper level hire, who had no previous experience with GAO work. This employee did not understand the importance of identifying deficiencies and developing recommendations. The ultimate report provided "information" but no recommendations of substance. The report resembled a theoretical paper the upper level hire was accustomed to preparing for his previous employer.
- A large audit program had several deficiencies which the regional staff tried to rectify. These efforts precipitated personality conflicts which hurt later coordination. Specific assist concerns of regional staff include:

1. Questions asked of the same offices or levels of government were scattered throughout the program, making planning work at each audit location difficult.
2. Policy questions and program questions were intermingled and not directed to the proper officials. Policy questions should be asked of program directors, not lower level employees.
3. Different information was requested from different levels of government, thereby destroying the unity of the audit. Conversely, the same information was not asked of each level of government.
4. The guidelines did not reflect an awareness of the current status of operations in the States. Also, there was no indication that recent GAO work in the same States dealing with the same topics had been culled for pertinent information.
5. Technical language within the guidelines was not consistent.

Recommendations

- Management should require peer group review audit programs to ensure they are comprehensible and correspond directly to the audit objectives.
- Staff responsible for preparing the audit program should visit regional audit sites whenever practicable prior to requesting assist work from the region.

RELUCTANCE TO KILL UNPRODUCTIVE ASSIGNMENTS

Some assignments, while first looking worthwhile in their initial justification, may not prove to be so once the planning and scoping is completed. However, Council constituents have observed a reluctance to stop ongoing assignments once substantial resources have been expended. In some cases the Council found that senior management wanted the job completed for extraneous reasons. In many of these cases the staff are simply unable to convince their managers that the assignments are not worthwhile.

Examples

Some assignments continue far beyond the time when they should be terminated, as indicated in the following examples:

- The two assist regions state that the information supporting the audit objectives is simply unavailable. The job

continues and the assist regions provide virtually no supporting information after spending over 500 staff days.

- A specified level of effort is programmed for an issue area, but initial planning/scoping fails to identify any potential deficiencies. The operating group continues to provide staff days, indicating that even if no deficiencies are discovered, an "informational" report would be acceptable. The ultimate report produces no deficiencies.

Recommendations

The Council has no specific recommendations for rectifying this sensitive problem. We do discuss, however, some relevant matters in our concluding remarks section.

COORDINATION AMONG GAO GROUPS NEEDS TO BE IMPROVED

Staff have expressed concern that coordination is not adequate to avoid duplication of effort by "competing" evaluation groups. This duplication, when discovered, sometimes results in termination of audit work. However, in other instances reports may be issued and their impact diluted because previous reports discussed the same issues and in some instances made similar recommendations. Detailed procedures are established for coordination among various audit groups within GAO. In addition, organization units within GAO such as the Office of Program Planning have responsibility to assure that duplicate assignments are not undertaken. However, indications remain that the present system has been less than fully effective.

Examples

Coordination among GAO evaluators needs to be improved. We all need to communicate better with each other. Staff indicated that such lack of communication, and inadequate planning efforts which fail to identify previous work, resulted in needless duplication of effort. The seriousness of this problem is clearly demonstrated below.

- A 200 staff-day assignment had to be killed after it was learned that somebody else was much further along on the same assignment.
- Two extensive evaluations were conducted on the same agency and its grantees by different operating divisions. The first report was issued and now the second evaluation team is trying to develop new recommendations since their tentative ones were used in the other division's report.
- Coordination on the job occurred by phone and mail because of travel restrictions. New people in the operating divisions were assigned after the work papers were sent in.

The new operating division staff was very frustrated by having had no previous experience on the assignment. This concern was expressed for several assignments.

- Staff indicated in a recent Employee Attitude Survey published in the GAO Management News that organization conflict existing between divisions or offices gets in the way of getting the job done (60 percent said yes). Staff also questioned whether coordination among divisions or offices is good in this organization (47 percent said they disagreed with the statement that coordination was good, while only 26 percent said yes, it was good).
- Kick-off conferences can be very useful in assuring that staff understand the evaluation objectives and that a working relationship is established. However, such meetings must be carefully planned. Concerns expressed about one such conference involved holding the kick-off conference before any of the background materials were distributed and the guidelines could be reviewed. The effect of this situation was:
 - Wasted field and headquarters staff time at the kick-off conference.
 - Considerable staff time was spent in reorganizing the audit program; checking for duplications, gaps and overlaps among tasks; and eliminating inconsistent language.
 - Morale was hurt because of the poor guidelines, ineffective kick-off meeting, and most importantly, the lack of feedback (critical or complimentary).
- Few staff knew of the computerized data bases listing published GAO reports and ongoing evaluations by subject matter. Use of these data bases can quickly provide lists of all relevant GAO evaluations.

Recommendations

The Council does not recommend new procedures for assuring proper coordination. We do, however, suggest that greater attention be given to this important function. The areas of staff concern which should receive coordination are;

- Identifying previous GAO audit work during the planning/scoping phase, preferably through use of existing data bases.
- Holding kick-off conferences only after the staff has time to review the background information and perform some initial audit work.

- Authorizing adequate travel so staff responsible for working on multi-region or international assignments have the opportunity to meet and discuss work objectives.
- Providing additional time in those instances when operating group staff are assigned to an evaluation after completion of field work and have no previous knowledge in the subject matter.

MEASURES OF REPORT QUALITY
MAY BE INAPPROPRIATE

Current measures of report quality used by the Office may not be entirely accurate and may not contribute to the Office's overall effectiveness. While we recognize that the emphasis appears to be on shorter evaluations which concentrate on economy and efficiency, the great emphasis now placed on acceptable PASS scores and meeting staff and calendar day budgets may actually be degrading the effectiveness of our reports. Many Council constituents observed that some of their best assignments were long, complex audits which substantially exceeded initial staff day budgets, and perhaps even received a low PASS score. However, these reports ultimately helped reform Government operations and/or saved substantial amounts of money which the PASS system failed to consider.

Examples

We have no examples to demonstrate inappropriate report quality measurements. Our concerns relate to "potential" problems since we have not observed how management will use their current report quality measurement systems.

Recommendations

The Council recommends that:

- Report quality measurements should be expanded to include information on the ultimate report accomplishments.
- Some measure of evaluation methodology be developed.
- PASS score results should be made available to all staff so they can become familiar with the evaluation process and to encourage greater accountability.

REPORT RECOMMENDATIONS SHOULD
BE MORE SPECIFIC AND THEIR
IMPACT MEASURABLE

Too many GAO recommendations concentrate on requesting additional studies or expanding government operations without adequate consideration of their costs. The effect of such recommendations is that potential cost savings achieved through much of GAO's work may be lost. Concerns about our recommendations stem in part from a lack of emphasis on developing recommendations during

the evaluation process. Most of the evaluative effort is spent on developing the cause, criteria, and effect necessary for the body of our report. The Council planned to evaluate this subject further, but deferred our work when we learned that the Office of Policy plans to complete an analysis on this subject. The Council believes that a great deal more effort needs to be placed on developing recommendations while the audit work is being carried out. The results of the Office of Policy study, if disseminated to the staff, should help.

CONGRESSIONAL REQUESTS SHOULD BE MORE
NARROWLY SCOPED

Responses to congressional requests may use far more resources than needed to provide the information initially requested. Staff expressed concern that initial requests for relatively easy to supply information may be expanded into much more comprehensive and time consuming evaluations. This may occur since congressionals are considered relatively "safe" in that they will receive top priority for allocation of resources within the office. Further, some staff believe that relatively small jobs may not enhance their promotion prospects. The delays inherent in doing a large assignment may reduce or eliminate the value of the information ultimately provided. Timeliness becomes even more important with high turnover among elected officials who may have left office before GAO's evaluation is completed.

Examples

Some congressionals are far too broad, which results in wasted effort should the information provided not be used or not be timely.

- A subcommittee chairman requested a study on the economy and efficiency of the program, which required audit work in excess of one year. This Member of Congress was not re-elected, and the issue became one of program effectiveness and whether we should have the program at all. Rather than drop work on the no longer appreciated issues, the report was completed and is now in processing.
- A subcommittee chairman requested some information and a small evaluation about one part of the program. GAO management decided to do a much larger evaluation which took 2 years to complete. The Member of Congress was not re-elected, and nobody appears interested in the subject now. The delay in getting the evaluation finished resulted in the chairman not getting the information he wanted and the entire evaluation effort, when published, will be of little use.

Recommendations

The Council recommends that:

- Congressional requests be scoped as narrowly as practicable so as to provide the requested information as soon as possible.
- GAO staff continue to propose the larger evaluations to the Congress, which would still receive priority should the congressional request be received and accepted. However, the internally generated audit work later justified as a congressional should be separately identified.

SOME GENERAL OBSERVATIONS--
CHANGING STAFF PERCEPTIONS

Concerns cited in this paper will probably always be with us, to some degree. The Council believes that this issue is both a "people" and a perception problem. However, the Council believes that management can and should do more to alleviate these concerns of the staff. In addition to acting on the recommendations previously cited, management will need to commit itself seriously to improving information transfer within the Office. Such action will show that management cares about these problems and is willing to resolve them.

Information transfer does not mean just sending memos, regulations, or manuals to staff. It means telling the staff what is important, performing periodic follow-up to ensure that staff at all levels understand and correctly implement Office policy, and holding them accountable for their actions. The Council believes this is absolutely essential to GAO's using staff efficiently, improving staff morale and productivity, and achieving overall organizational effectiveness. The Council, as always, looks forward to discussing these issues and participating with management in any subsequent efforts to resolve them in the best interests of staff and management.

OBJECTIVES, SCOPE AND METHODOLOGY

The objective of this paper is to identify our constituents' concerns regarding the work they perform, and to develop recommendations for improvement. We concentrate on planning since that seemed to be a major area of concern. Further, since our constituents spend much of their time with evaluations, inadequate planning affects them directly.

A recent Office of Program Planning briefing paper cited the importance of planning as shown in this extract.

In 13 of the 15 cases we looked at, the thoroughness of job planning was a major factor affecting how the job turned out. The specific ingredients of good job planning identified were (1) enough time invested to preclude premature implementation; (2) identification of all tasks that need to be

performed, and information or sources of information needed (documentation, statistics, etc.) to perform these tasks; and (3) determination of information availability to assure that we can perform the tasks and to establish realistic staff-day and milestone estimates.

Staff utilization, morale, and productivity decline when these ingredients are missing.

Our evaluation approach was to identify the concerns of the Council and its constituents, identify relevant GAO management practices and controls, and then develop specific recommendations for improvement which will minimize the staff's concerns.

Concerns about GAO work are based on examples of actual assignments on which our constituents worked; on the GAO Organization and Management Planning Staff handbook published in 1974, "Lessons Learned;" and the February 1981 Office of Planning and Programming (OPP) study, "Briefing on Cost Overrun Work." Specific examples are presented to facilitate discussion, but the assignments are not identified by name, as we do not intend to criticize individual jobs. The Council believes the examples developed in this paper demonstrate the general concerns the staff have and are not atypical. The examples cited were volunteered by concerned staff. Since no other selection criteria were used, we cannot statistically project our conclusions as representative of all jobs.

Initiating an assignment in GAO requires extensive coordination and approval. We discussed the planning and approval process with responsible managers from operating divisions, the Office of Program Planning (OPP), the Office of Policy (OP), the Office of Congressional Relations (OCR), the Office of Internal Review (OIR), and the Institute for Program Evaluation (IPE). These representatives explained how GAO operates in this area and what controls currently exist to assure the best possible use of GAO's resources. Written procedures specified in GAO's Project Manual for assuring quality control were also considered.

After comparing the staff concerns with existing procedures, we developed tentative recommendations that should help improve GAO's effectiveness. The recommendations were discussed extensively by Council representatives, all of whom brought different perspectives to the discussion. We do not believe that the Council's recommendations are the final answer to GAO's problems. However, we hope they will serve as a basis for a continuing dialogue on these important issues.

CURRENT SYSTEMS FOR ENSURING EFFECTIVE PLANNING AND STAFF UTILIZATION

GAO has several organizational units responsible for ensuring effective planning and staff utilization. These units monitor

congressional requests, as well as internally generated reports, with the intention of assuring that all reports are of the highest quality. Quality control units are designed to assure good planning and see that senior management are aware of any problems early in an assignment. Some of the specific quality control activities include the following:

- Each proposed assignment must be approved by programming division management. Division management are experienced with the issue area and determine whether the ultimate report will contribute to better government and possible cost savings.
- Each issue area plan and all new assignments related to specific issue areas and lines-of-effort must be approved by senior GAO management.
- The Assignment Review Group (ARG) assists the Comptroller General in assuring that divisions effectively manage the work of GAO. It gives special attention to projects which are clearly or potentially expensive, highly sensitive or controversial, or require advanced analytical techniques because of their complexity.
- The Office of Program Planning reviews and comments on the program plans and monitors the operational planning and performance of all operating divisions. It also provides staff support to the Assignment Review Group.
- The Office of General Counsel provides legal advice and assistance on all legal matters on behalf of the Comptroller General.
- The Office of Congressional Relations provides liaison to Members of the Congress, committees, and their staffs.
- The Office of Policy establishes policies, standards, and procedures to be followed in planning, preparing, and processing reports. This office is responsible for the Policy Analysis and Scoring System (PASS), which establishes a rough measure of report quality.

Staff are informed of the policies and procedures for completing an assignment through various instructions which are then periodically updated. Examples of these publications include the Project Manual, Report Manual, PPMA Manual, and the Comprehensive Audit Manual. Periodic instruction is offered, especially to new staff, so they will understand the new procedures.

GAO has additional methods for improving report quality. Consultants can be hired or advisory panels established to evaluate exceedingly complex matters. The Institute for Program Evaluation (IPE) and specialized groups in other divisions may provide technical assistance in complex matters. Reports are generally provided to the agency for review and comment before issuance. Draft reports may be referenced by another evaluator

not directly associated with the assignment, who checks the soundness of the report's logic, verifies the accuracy of all facts, and ascertains whether the work papers and related materials adequately support findings, conclusions, and recommendations. After the report is issued, accomplishments are routinely identified and written up to support GAO's efforts. Report users are periodically requested to comment on report utility. Congressional committees or other outside bodies may periodically evaluate our work. At least one GAO regional office requests critiques on job quality on a routine basis.

GAO management recently addressed some of the concerns regarding job quality and report timeliness by placing requirements in the division directors' SES contracts. While we were unable to review the specific contracts, we understand they contain sections requiring the divisions' reports to achieve, a specific PASS score, on the average, and meet calendar and staff-day budget constraints. All contracts require the directors to assess the impact of their reports.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 28 1981

TO : Director, Office of Personnel - Felix R. Brandon

FROM : Chairperson, Career Level Council - Bob Lewandowski

*Bob Lewandowski*SUBJECT: Factors Affecting the Ability of GAO Staff to Transfer to
the Competitive Service

Since GAO switched from the competitive service to an excepted service, staff has grown concerned over their ability to transfer into the competitive service. Specifically, they are anxious about the problems caused by GAO's single agency job classification (i.e., GS-247), and the confusion surrounding their transfer rights. CLC has investigated these problems and recommends actions to alleviate some of the staff's concern.

CLASSIFICATION

We have found several cases where staff members applying for positions outside GAO believe they were rejected on the basis of their Evaluator classification. We concur and believe there are two reasons for these rejections:

1. The Evaluator title which may be summarily rejected by other agencies' qualification screening process.
2. The Evaluator position description which does not adequately reflect the staff's duties and responsibilities and, therefore, may be rejected by other agencies' selection panels.

The first reason for rejection of staff applications--the Evaluator title--may be alleviated over time as more personnel offices Government wide become familiar with the title. However, the position description should be revised to reflect more accurately what an Evaluator does during an audit. Depending on the audits in which GAO Evaluators participate, they may review and analyze financial information; determine the effectiveness of a Federal program; or evaluate the efficiency, economy, and legality of efforts of Federal agencies to carry out financial management and program responsibilities. These varied tasks and responsibilities should be reflected in an Evaluator's job description.

While GAO cannot make qualification determinations for other agencies, we believe something can be done to lessen staff concern about their ability

to compete successfully in the Federal service. We, therefore, recommend that the Personnel Office implement at least one of the following:

1. Amend the Evaluator classification standard to include the actual duties and responsibilities of an Evaluator, as set out in Attachment 1 of this memo.
2. Include in each individual's Evaluator job description the classification terminology used in the job description of his original job series--for example, the 510 series--so that other Personnel Offices can readily determine the employee's qualifications for the position for which he is applying.
3. Attach an addendum to an individual's job description specifying how the issue areas in which the individual is working qualifies him for the positions for which he is applying. A precedent for this was established early in the 1970s with the GAO Management Auditor/ Personnel Management Specialist and Economist series.

TRANSFERABILITY RIGHTS

Several staff members believe they have been rejected solely because they were working for GAO's excepted service. We consider this to result from staff ignorance of their rights to transfer into the competitive service.

GAO, therefore, needs to explain both the advantages and disadvantages of working under its current system. To date, the Office of Personnel has not adequately informed staff of the implications of the new regulations and OPM/ GAO agreements affecting transferability. Although Personnel has published the regulations and letters agreed to by OPM in the Management News, it did not clearly explain how staff experiences and time with GAO will affect opportunities to transfer out of the Office.

While trying to address the staff's concerns about transferability, we encountered what we believe may be contributing to the staff's confusion. There exists no single focal point within Personnel which can totally address the transferability issue. Obtaining answers to our questions required discussions with several people. We also noted that the interpretation of our transferability rights differed from person to person.

In light of the above, we felt that the following recommendations could help improve communications and explain the transferability rights of both present and future GAO employees.

1. A focal point in Personnel should be publicly established to assist staff when questions of transferability arise.

2. Management should provide personnel team specialists clarification of both present and new regulations. In this way, interpretation of GAO's new laws will be consistently and uniformly applied by Personnel specialists, who will then have all the tools available to help staff decipher their transferability rights.
3. The Office of Personnel should publish--either in the Management News or in a separate flyer--what the regulations mean for individuals coming to GAO before and after October 1, 1980.

A narrative could be attached to this chart describing a staff member's recourse if problems are encountered and in what areas GAO's Personnel Office is willing to assist them. In this way, present GAO staff will understand the benefits of working under GAO's excepted service system, their transferability rights, and ways to circumvent potential transfer conflicts. This chart and narrative should also be distributed to all future staff members so that they will be fully aware of the ramifications of working under GAO's excepted service system.

GAO has a responsibility to inform its staff of all implications of the new GAO regulations and Evaluator series. When the staff is apprised of these regulations and their impact on transferability, they will be able to inform those agencies to which they are applying of their rights up front--before problems arise. We believe that the members who were caught up in the switch from competitive to excepted service should receive some director and assistance in deciphering how a series and status under which they were not hired qualifies them to move into other Federal agencies.

If you have any questions regarding the recommendations discussed above, please contact Janet Greenspan, ID/CLC representative at FTS 275-5889.

Attachment

ATTACHMENT

ATTACHMENT

Proposed recommendations to the GAO
evaluator (GS-347) position description

We believe that the position description for a GAO Evaluator (GS-347) does not fully include the duties, knowledge, and skills required for such a position; therefore, the position description could be amended to include:

Duties

- Review financial reports, records, and other information; reconcile any discrepancies; and analyze the impact this information has on program effectiveness.
- Schedule information from various sources, including but not limited to functions performed by the agency and financial information, also when scheduling, the accuracy of the information it must be checked by various methods, including tracing it back to the source document, and footing and crossfooting the schedule when possible.
- Evaluate programs to determine the effectiveness, economy, and efficiency of their resource utilization and management systems, to determine the program's degree of compliance with laws and regulations, and when possible show the effect agency actions have on the program executor.

Factor I

- Knowledge of GAO operational auditing and reporting principles, standards, practices, and techniques.
- Principles, concepts, and methodology of General Management, including financial management.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

MAY 28 1981

TO : Chairperson, Career Level Council - Bob Lewandowski

FROM : Director of Personnel - Felix R. Brandon, II SUBJECT: Factors Affecting the Ability of GAO Staff to Transfer
to the Competitive Service

This is in response to your memorandum of April 28, 1981, Subject: "Factors Affecting the Ability of GAO Staff to Transfer to the Competitive Service."

While we can appreciate your concerns in the area of classification and the ability of GAO employees to transfer to other agencies, we have no authority to participate in qualification determinations made by other personnel offices. We have taken steps to assist employees looking to transfer by preparing a statement on the 347 series which could be used as an attachment to the SF-171 and issuing an article in the GAO Management News which explained the 347 series and its relationship to other series. This is about as far as we can go without either interfering in another personnel office's domain or lessening the accuracy of the Evaluator Classification Standard and position descriptions.

The reason for the development of the Evaluator standard was that already-existing Office of Personnel Management (OPM) classification standards did not adequately describe the work performed by GAO staff. A new standard was needed to allow GAO to attract and retain the staff required to fulfill our mission. The research and development of the standard took several years, and the focus was always on a single-agency standard which would accurately describe the primary occupation of GAO and provide grade level criteria to classify GAO positions. Prior to establishment of the standard and position descriptions, drafts were first circulated throughout GAO, and later, final versions were approved by divisions and offices.

In May 1980, the divisions and offices were asked to identify all employees performing GAO Evaluator duties and indicated those who should be converted to the GS-347 series. They also were asked to identify those employees who, because of their assignments, should not be converted. This information was used to effect the conversions in October 1980. Since that time the Evaluator position descriptions have been "recertified" as accurate by supervisors throughout the Office.

Your memorandum recommends that the Evaluator position description be amended to include the performance of financial management work. However, the above-mentioned certifications indicate that the current Evaluator position descriptions are accurate and are reflective of the work assigned staff.

While we can understand the concern of employees having accounting degrees and who are not assigned to GS-510 accountant positions, it should be recognized that GAO no longer concentrates on financial reviews and that while we continue to conduct financial audits, only those employees whose primary responsibilities are to perform accounting work are properly classified in the GS-510 series.

The GAO Evaluator classification standard specifically excludes those positions that "require professional knowledges of accounting principles and theory in the design, development, installation, operation or inspection of accounting systems; the development and interpretation of accounting requirements; the audit or similar examination of accounts and records of transactions; or the examination, analysis and interpretation of accounting data and reports. Such positions are classified in the Accounting Series, GS-510."

With regard to your concerns about information available to staff on transferability rights, the Personnel Team Specialists will serve as the focal point for handling questions in this area. They will be provided with the information they need to supply accurate guidance to staff members within their assigned organizational entities. In addition, we will be publishing an article in the GAO Management News which will further clarify the advance FPM Letter which was previously issued.

cc: Mr. Pin
Mr. Fee

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 28 1961

TO : Director, Office of Organization and Human Development -
Arley F. Franklin

Bob Lewandowski

FROM : Chairperson, Career Level Council - Bob Lewandowski

SUBJECT: Development of Evaluator Supervisory Skills

Career level staff believe that there is a need to emphasize the development of supervisory skills beginning at an early stage and continuing through the career ladder 1/. Our concern is based on the following: (1) there is no system to provide feedback on supervisory skills; and (2) sufficient supervisory training (i.e. course openings) is not available.

In studying these issues, we interviewed staff and received information from OOHM on recent and planned changes in training courses. We also considered the likely effects of the behaviorally anchored (BARS) and results oriented appraisal systems, training operations at the division level, and budget constraints.

While BARS and PPMA provide for feedback on supervisory skills, it is not yet clear how this feedback will be handled. Career level staff feel that on-the-job supervisory instruction through closer contact between lower and upper supervisors is vital. Performance appraisal systems should insure that this on-the-job process is complemented by supervisory training courses.

Openings for the two supervisory courses--Elements of Supervision and Advanced Supervision--are insufficient due to a two year training hiatus. Reducing the backlog of people scheduled for the course could take more than a year at the present rate. Since proper supervision is essential for accomplishing job objectives and the staff would benefit from exposure to these skills, we recommend a supervisory workshop be arranged in lieu of formal training as was done in the International Division. The training group, which supports this idea, should provide the necessary workshop material 2/.

1/This issue has also been raised by the 13/14 Management Advisory Council.

2/Arranging such programs and managing course assignment is the responsibility of divisional or regional training coordinators or resource officers. However, the role of these individuals is being revised in many offices and this will affect training operations.

The following are suggestions we developed for improved supervisory training:

- Encourage implementation of training systems where superiors provide feedback on supervisory performance.
- Ensure that existing systems be used to provide supervisory training where needed.
- Schedule additional courses in supervisory training. If this is not possible, provide workshops at the divisional/regional level using prepared materials to reduce the training backlog.
- Improve training coordination.

Should you have any questions, please contact Ms. Michele Rothenberg, EMD/CLC representative, at FTS 275-3916.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

May 29, 1981

TO : Chairperson, Career Level Council

FROM : Director, OOHD - A. F. Franklin

SUBJECT: Response to Memorandum on Development of
Evaluator Supervisory Skills

We concur with the Career Level Council's belief that the development of supervisory skills at an early stage is important and we are committed to providing to all who, because of their responsibilities, need the training.

To meet this need, we have developed three courses:

1. Auditing and Job Management Skills, in which an introduction to planning and monitoring of a job is presented.
2. Elements of Supervision, which provides introductory training in most aspects of supervision.
3. Advanced Supervision, which focuses on the development of human resources.

Additional management activities will be developed during the next twelve months.

In order to schedule sufficient courses in Fiscal Year 1982, shortly, we will be surveying each division and region to obtain a projection of needed training. Courses will be scheduled based on the projection.

The delivery of unit-specific supervisory courses, such as the one presented in ID, is a possibility if a unit has identified a need that cannot be met by the regular course offerings.

In reference to your concern regarding "feedback on supervisory skills," the BARS performance appraisal system contains specific supervisory tasks on which all supervisors should be rated at the end of a job and, informally, while a job is in progress.

Please feel free to contact Rosalind Cowie, Chief, Training Branch, if you have further questions.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

MAR 30 1967

TO : Policy Development and Evaluation Branch, Personnel

FROM : Chairperson, Career Level Council - *Robert Lewandowski*

SUBJECT: GAO Maxiflex Alternative Work Schedule Program

The Career Level Council fully supports the interim GAO Order 2620.1 which sets out GAO's maxiflex program. As written, the interim Order provides for a fair and liberalized program which maximizes employees opportunities to adopt alternative work schedules.

The Career Level Council continues to strongly support the maxiflex program as a prime contributor to employee morale and job satisfaction.

Thank you for your consideration.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

MAR 30 1981

TO : Assistant Comptroller General for Administration -
Clerio P. Pin

FROM : Chairperson, Career Level Council - *Robert Lewandowski*
Robert Lewandowski

SUBJECT: Evaluation of Maxiflex Alternative Work Schedules
Experiment

This is in response to your February 6, 1981, memorandum requesting CLC input on the above subject. Our comments primarily relate to impact areas #1 and #6 as set out in Federal Personnel Manual Bulletin 620-10.

The Career Level Council would like to reiterate its strong and continuing support for a liberal maxiflex schedule. Flex-time has been a major CLC issue for the past 2 years during which we have documented the extremely positive effects it has had on employee morale, job satisfaction, and family relationships. We have also found few problems or documented negative effects from flexitime other than minor administrative burdens. Our 1980 Annual Report discusses these findings in more detail on pp. 34-37.

We hope that GAO's response to the Office of Personnel Management concerning maxiflex will reflect CLC's position, which we believe is widely shared throughout the organization.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

MAY 6 1981

TO : Heads of Division and Offices

FROM : Director of Personnel - Felix R. Brandon, II



SUBJECT: Report to Office of Personnel Management on Maxiflex Experiment

Attached for your information is a copy of the report we recently submitted to the Federal Office of Personnel Management on GAO's maxiflex alternative work schedules experiment. We want to acknowledge our appreciation for the effort you put in to the many individual reports we received. Work is also progressing on revising Interim Order 2620.1 (Maxiflex) based on your comments.

Distribution: Code B and Employee Councils

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 28 1981

TO Acting Director, Office of Budget - Richard Brown

FROM Chairperson, Career Level Council - Bob Lewandowski

Bob Lewandowski

SUBJECT: Management of Travel Funds

The Career Level Council (CLC) recently explored the management of travel funds and how travel budget considerations affect assignment start-ups and completions. We had two concerns: (1) inadequate travel management may result in unnecessary assignment disruptions, particularly near the end of a quarter; and (2) travel fund conditions may cause delays in initiating some very worthwhile assignments, or result in assignments being performed at inappropriate locations.

In response to these concerns, the Council surveyed the processes for allocating travel funds among divisions and offices. We also talked to management and staff from a sample of these units to determine the scope of the problem. As a result of the inquiries, we found that a limited number of assignments had been turned down or seriously delayed solely because of the lack of travel funds. We did find, however, that the management of travel funds is, at best, haphazard.

Each unit surveyed generally had a system in place to monitor obligations of travel funds. We found, however, that use of these systems was not stressed until the availability of travel funds became critical. We also found the the use of these systems was not consistent.

The Council was pleased to hear that GAO established an Office of Budget with intentions of specifically placing more emphasis on the budget process. We believe that budget formulation and presentation are important in light of possible reduced GAO funding and increased travel costs.

Since travel fund availability drives many decisions as to when, where, and how we do our work, the Council recommends that the Office of Budget strongly encourage that divisions and offices place high priority on managing this resource. As a first step, the individual units should emphasize to its staffs, the utility of using established monitoring systems continuously, rather than when a crisis arises. Following this, the Office of Budget should take a lead role in helping develop more effective travel fund management in GAO.

Should you have any questions, please contact Al Davis, ARO/CLC representative, at FTS 242-4616.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

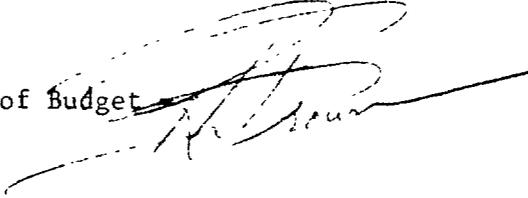
Memorandum

JUN 10 1981

TO : Chairperson, Career Level Council -
Bob Lewandowski

FROM : Acting Director, Office of Budget
Richard L. Brown

SUBJECT: Career Level Council concerns over the Management
of travel funds



In reference to your memorandum of April 28, 1981 regarding Career Level Council members' concern over the management of travel funds by divisions and offices, I would like to provide details of the distribution of travel funds from an agency perspective.

The Office of Budget (OB) manages and controls the total budget of the General Accounting Office. Individual divisions and offices are responsible for managing and controlling their portion of the total GAO budget.

Over the past few years OB has implemented procedures to aid divisions in tracking and controlling their budgeted funds. For instance, all annual allocations to divisions for travel and other object categories of expense are apportioned into 4 Quarterly Allotments. OB develops these allotments based on division/office input and issues financial plans for each division/office. These financial plans, once developed, serve as a planning document for travel and other expenditures. Analysts from OB are in constant contact with their assigned divisions to ensure that these quarterly allotments are adhered to or revised, if need be.

OFM provides monthly financial statements to divisions/offices which show expenditures compared to allotments and the amount of funding unexpended. These statements are accompanied by detailed backup sheets which show the amount of travel and other objects expended by responsibility areas within each division. In addition, there are several other detailed travel reports available to divisions and offices through the TAMPS system to aid in tracking travel.

OB has and will continue to be available to aid divisions/offices in the management and control of travel funds and for other objects funds. However, the individual divisions/offices have the ultimate authority to decide how they will manage and control their funding.

cc: Mr. Pin
Mr. Fee

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

OCT 9 1980

TO : OP, Project Manual Director - Stephen C. Swaim

FROM : Chairperson for Career Level Council - Bob Lewandowski
with Steve Swaim

SUBJECT: The Manual for Selecting, Designing, and Managing Projects

The Career Level Council appreciates the opportunity to comment on this draft manual, which will provide important information regarding the preparation of reports. The identification of information sources within the General Accounting Office is an invaluable document for the staff. It is a much needed reference document, is easily readable, and should provide this staff with data necessary to conduct GAO work.

However, we thought the purpose of the document was to integrate the various reporting systems within GAO -- PPMA, JSSS, etc. It was not clear, after reading this document how these systems interrelated. Therefore, the Council offers the following suggestions for the draft manual.

1. A forward to the manual should be prepared explaining this manual's interrelationship to the Comprehensive Audit Manual and the Report Manual. All three manuals were prepared to meet differing objectives. These objectives and their interrelationships should be fully explained.

2. The text should explain the interrelationship between the various reporting systems within GAO such as PPMA, JSS, etc. The explanation should provide an insight to the impact each system and their interrelationship have on the timelines and quality of GAO's product.

3. The discussions which explain the office organization and how reports flow through the office are complex. It takes a certain initial understanding of how our office works to follow them. Such needed background normally may not exist at the beginning grade levels; i.e., council constituents. Thus, we suggest some simplified organization charts and flow charts be included to assist the reader in understanding the issues presented.

4. Several charts take up a page or more, which makes it difficult to follow the text. When two charts are placed together, the comprehension difficulty is increased. We suggest several of the charts to be moved to appendices at the back of the chapters. The charts all seem to serve a useful purpose. Thus, there is no need to delete any.

5. The discussion of the issue areas should include a table showing the number of staff years and ongoing audits. Such information should indicate each issue area's significance.

6. The discussion on audit priorities in Chapter 2 is primarily a theoretical one. We suggest that the priority two assignments be specified in greater detail. Further, information on the workloads for each type of audit priority should be provided. Thus, the staff will understand the relative importance of each job, given its priority.

7. The discussion of Project Planning and Management Approach (PPMA) is useful but very theoretical. We suggest some statistics be included indicating how long, on the average, each audit phase took for recently completed audits.

8. The Assignment Review Group (ARG) discussed in Chapter 2 has an important responsibility in reviewing ongoing assignments. The ARG discussion, however, fails to specify what actions they have taken on recent assignments. Since most staff don't realize what specifically the ARG recommends, such information would be very informative.

9. Chapter 9 provides lists of questions which should be asked during the preparation of each report. Such questions are worthwhile and should be considered during all report preparation. However, it seems to us that additional explanation should be provided specifying which portions of the report need greatest attention. For example, the Office of Policy now evaluates many reports, identifying weaknesses in many draft reports, such weakness can be identified in this report Chapter, so staff can strive to improve that portion of the report.

10. Chapter 14 provides a great deal of information on how the staff can best use the GAO library resources. However, GAO library operating procedures do not allow regional office employees to check out books. This is not clearly specified anywhere in the chapter. It should be clearly specified at the beginning of the chapter, along with suggestions on how regional office staff can get access to books when needed. It is our understanding that any books purchased by GAO staff must be procured by the Librarian. This information should also be included.

11. Chapter 17, which discusses the legal services provided, should be expanded to place emphasis on the need for early coordination with the General Counsel whenever it is expected that significant legal questions will be raised during our audit work. The current section in the Report Manual discusses the need for referral to the General Counsel in instances of fraud, proprietary data, or litigation. These statements should be included in this manual too. Most experienced staff can cite examples of a significant delay when the Office of General Counsel gets involved at the end of an assignment rather than at the beginning.

We appreciate the opportunity to comment on this manual. We are sure it will be used and believe that it should be distributed to all staff.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 28 1981

TO : Chief, Evaluation Branch, OOHD - Jan H. Goldstein

THRU: Director, OOHD - Arley F. Franklin *Bob Lewandowski*

FROM Chairperson, Career Level Council - Bob Lewandowski

SUBJECT: BARS and its Application

The Career Level Council has decided not to issue a position paper at this time regarding the BARS performance appraisal system but will continue to monitor its development and implementation. Council constituents are concerned about the large amount of paperwork and time required to conduct performance appraisals using BARS. We also believe that basing salary decisions on BARS results before it has been proven effective may result in misunderstood salary decisions and thus impede acceptance of the system. We still plan to gather information from management on each unit's procedures and policies for implementing BARS, and the observations of raters and ratees who have been exposed to BARS. However, in light of the current study being conducted by the Evaluation Branch, the lack of historical data due to recent implementation, and the delay of the merit pay system, the Council believes it is premature to take a position at this time.

The Council has obtained the following additional input from our constituents, which you may wish to address during your study:

- BARS training has been inadequate.
- Development suggestion sheets should not be part of the rating form.
- Percentages used in overall assessment of job dimensions are a questionable quantitative measure.
- Implementation ratings given before the BARS process is validated should be clearly designated.
- The correlation, if any, between career ladder promotion decisions and BARS is unclear.
- The interface between BARS and Results Oriented System should be more clearly defined.

The Council is awaiting your evaluation of the BARS system. As always, we welcome any opportunity to contribute to the agency's development of a complete performance appraisal system. Should you have any questions, please contact John Hutton, MSAD/CLC representative, at FTS 275-3507.

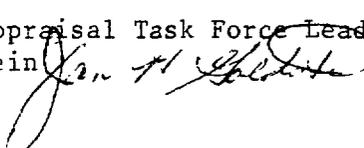
UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

May 5, 1981

TO : Chairperson, Career Level Council - Bob Lewandowski

FROM : Performance Appraisal Task Force Leader, OOHD -
Jan H. Goldstein 

SUBJECT: BARS

We appreciate your comments and offer of assistance regarding the development of performance appraisal systems. Let me take this opportunity to assure you that as decisions are made about BARS as well as the other performance appraisal systems that your group will be informed immediately.

The concerns you raised in your memorandum of April 28, 1981 are presently being addressed or will be addressed as OOHD's evaluation efforts in this area take place. During our recent visits to the divisions and regions, these concerns were all raised and we have tried to respond to them accordingly. In addition, we plan to address these areas through; Management News articles, development of a GAO policy on performance appraisal, and through each units requirement for establishing ancillary systems to support the performance appraisal system.

If you or any member of the council would like to discuss these or any other areas of concern in more detail, I would be more than happy to accommodate in any way I can. Please feel free to contact me at 357-0428.

cc: Mr. Franklin (OOHD)
Mr. Beusse (OOHD)
Mr. Schneier (OOHD)
Mr. Hutton (MSAD)

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

June 3, 1981

TO : Chairperson, Career Level Council - Bob Lewandowski

THRU : Director, OGED - A. F. Franklin

FROM : Performance Appraisal Task Force
Leader, OOHG - Jan H. Goldstein

SUBJECT: BARS

This memo is to respond more directly to your concerns and issues regarding BARS in your memo of April 28, 1981:

- BARS Training has been Inadequate: All of us working on the task force have a great concern over providing adequate training. To compensate for the lack of training to date on BARS we have a plan to take the following steps; (1) meet with each region and division to clarify and respond to the issues regarding BARS, (2) issue weekly articles in the Management News, (3) provide an orientation over the summer on BARS which will include the results component, and (4) work with OOHG's Training Branch in developing a training program, effective during the first quarter of FY 1982. The training will address those skills necessary to carry out an effective performance appraisal system and how to manage a performance appraisal system. Of course, one thing to recognize is that we don't profess that training will solve all the problems, the implementation and commitment by management is essential. Your support in this area is greatly needed.
- Development Suggestion Sheet Should not be part of the Form: The task force agrees with you on this point, and come October 1st this sheet will be separated and issued as a separate form.
- Percentages used in Overall Assessment of job Dimensions are a Questionable Quantitative Measure: As you are aware, OOHG's Evaluation Branch will be performing quite an extensive evaluation of all GAO's performance appraisal systems. The question on the percentages has been raised throughout GAO, and I have already discussed with the Evaluation Branch the need to look into the use of these figures immediately.
- Implementation Ratings Given Before the BARS Process is Validated Should be Clearly Designated: This is a good point and will be raised with the Evaluation Branch when they begin looking at the BARS program.

--The Correlation, if any, Between Career Ladder Promotion Decisions and BARS is Unclear: We've asked each region and division to address this issue in their implementation plan for BARS. From an organizational perspective we have stated that any individual in the career ladder, rating out as proficient or better is eligible for promotion.

--The Interface Between BARS and Results Oriented System Should be more Clearly Defined: We realize that this has been somewhat confusing to staff. We have already issued a Management News Article addressing this issue and we have just completed re-writing the BARS manual, where we have attempted to explain the difference between BARS (the process component) and the results component and how they fit together. This will also be addressed in the orientation program this summer.

Please be assured we will keep you and the CLC informed about the work the task force will be doing on performance appraisal, and will be seeking your advice and help to put together a performance appraisal system in GAO that will benefit both staff and management.

If we can be of any further assistance, please feel free to call me at 357-0428.

cc: Bill Beusse
Paul Zacharias

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

July 8, 1981

TO : Director, OOHD - A. F. Franklin

FROM : Chairman, Career Level Council - Bob Lewandowski
*Pat Iler*SUBJECT: CLC Comments on GAO Policy Statement on Performance
Appraisal--GAO Order 2430.1

We welcome the opportunity to comment on this draft policy. Due to the short timeframe for response our comments are necessarily general in nature and prepared without referral to the other GAO Orders cited.

The Council believes this policy statement provides a good general description of what GAO expects to achieve through its rating system and the general process and procedures for preparing and giving ratings. However, some sections of the policy statement are so general that they actually provide little if any guidance. For example, in Chapter 2 the order states that appraisal data should be used to make career ladder promotion decisions. Council constituents are particularly interested in this issue and believe that such decisions should be based on a uniform criteria throughout GAO. Yet, the policy statement gives no guidance on how ratings should affect these and other important personnel decisions.

The Council recommends that you give priority to preparing implementing guidelines for performance appraisals and management decisions based on these appraisals. GAO needs these guidelines to assure that all employees are treated fairly and consistently.

We hope these comments will assist in implementing a successful performance appraisal system for GAO. We also hope to participate in the continuing evaluations of GAO's appraisal systems as they are implemented. If you wish to discuss our comments further, please, contact Pat Iler at the Cleveland Suboffice, 293-4892.

cc: Clerio P. Pin, Assistant
Comptroller General
Francis X. Fee, Director,
Field Operations Division

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

July 17, 1981

TO : Director, OOHD - A. F. Franklin

FROM : Chairperson, Career Level Council - Bob Lewandowski

Bob Lewandowski

SUBJECT: CLC Comments on the Proposed Total Appraisal System for GS-7-14 Evaluators

We welcome the opportunity to comment on the draft instructions. The Council believes the instructions are a good initial description on how the BARS process interfaces with the results oriented portion to provide a total appraisal system for job performance. In reviewing the draft, we are pleased to note that a prior comment regarding the removal of the Developmental Suggestion Sheet from the appraisal form, has been accepted. Some of the concerns which follow have been expressed in prior correspondences. However, we wish to reemphasize them since some of these concerns may be aggravated when the results portion is implemented.

- By allowing each Division Director and Regional Manager to decide how the results and process portions are used in making personal decisions, there are bound to be inconsistencies among the various offices. Recognizing that Division and Regional ancillary systems for implementing BARS will be reviewed to ensure some degree of conformity, we believe performance appraisals in each office should be monitored to ensure that BARS standards are applied consistently throughout the organization and the criteria for personnel decisions are consistent.
- To be properly implemented, the setting of expectations up front is critical. We are concerned that the large amount of time necessary to do this for both the BARS and the results oriented portions will not continue to be available after the first few months. We believe it is vital that management take decisive action to ensure that adequate time is made available at the beginning of every assignment.
- The Council restates its concern that until the total performance appraisal system is validated, each implementation should be clearly designated as such.
- The Council questions the objectivity of percentages used in the overall assessment of performance. We believe that they are a questionable quantitative measure as they now stand. We recommend increased management attention to determine how effective these percentages might be, and the development of comprehensive guidance in their use. If their effectiveness cannot be demonstrated, their use should be discontinued.

- Several examples illustrating a complete rating cycle would be very useful not only during indoctrination, but also as a source of future reference. Therefore, we feel they should be included.
- The Council believes the proposed plan, that the total performance appraisal system be used to evaluate GAO Evaluators regardless of type of assignment, is not realistic since many Evaluators are not under the direct control of GAO. For example, on Hill assignments, it is unreasonable to assume that Committee staff members will be willing or able to use the appraisal system. Furthermore, due to the nature of Hill assignments, the administrative burdens may be much more severe since performance and product expectations change constantly. We understand that there will be a home unit designee who will be responsible for writing the appraisal based on input from the congressional committee staff supervision but feel this is an adequate compromise.

We hope these comments will assist you in implementing the total performance appraisal systems. Again, we welcome the opportunity to contribute and hope you will consider us in the future. Should you have any questions, please contact John Hutton, MASAD/CLC representative at FTS 275-3506.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

NOV 19 1980

TO : Special Assistant to the Comptroller General -
Clifford I. Gould

FROM : Chairperson, Career Level Council - Robert Lewandowski

Robert Lewandowski

SUBJECT: Comments on the Proposed Integrated Approach to
Classification, Performance Appraisal, and Pay

We appreciate the opportunity to comment on your concept paper "An Integrated Approach to Classification, Performance Appraisal, and Pay" dated October 16, 1980. We understand that this is a concept paper and there are no firm timetables for implementation of any ideas expressed in the paper. The following comments are also based upon our discussion with you on November 5, 1980. While the proposals may have some benefits, we do not have enough information to concur with even the concepts involved in the proposed plan. We have several concerns and have identified several requirements that should be included in any pay system. These are some of our initial responses and we request that we be continually involved throughout the design of this approach.

Specifically our comments are as follows:

- (1) Any merit pay system should be based on a tested and proven-effective results oriented appraisal system.
- (2) Any pay system implemented should ensure those doing satisfactory or better work would receive salary increases at least commensurate to that which would have been received under the present pay system. The attached comparison of the present and proposed pay systems illustrates the monetary inequities of the proposed pay system resulting over a period of time.
- (3) We propose one pay schedule as opposed to the four that are illustrated in the concept paper. Separating the pay categories is divisive and unfairly limits the career advancement and salary of some staff (i.e., Writer/Editors, Technical Information Specialists, Adjudicators, Librarians, etc.).

- (4) Should a pay for performance system be implemented, upon conversion, individuals at the upper steps of their GS pay schedule whose pay falls in a level higher than their current rate indicates; should be offered the option of either moving into the higher level or remaining at their current level. This decision should be made by the individual and not by management.
- (5) Any qualification and experience board should be a part of the Office of Personnel since the review of qualification is a personnel function. In addition, any board should include at least one person from the employee's job series at a higher level.
- (6) Any person who receives less than a satisfactory performance appraisal should be counseled as to the specific training and experience needed to improve performance.
- (7) Under your proposed approach, employees whose performance appraisals are consistently below fully satisfactory could migrate downward and move into the next lower level without a specific adverse personnel action. We oppose this policy. Downward pay migration into a lower level should be defined as an adverse personnel action with appropriate employee appeal rights. This is consistent with current Office of Personnel Management regulations on merit pay which prohibit downward pay migration below the base level of pay.
- (8) The terms used to describe performance in the pay adjustment process should be consistent with the terminology used in the overall performance appraisal system.
- (9) Implementation of any pay system should be pre-tested and phased-in over a period of time. Selected grade levels or offices/divisions could be used to test implementation feasibility, rather than imposing such significant office-wide changes at once.

Again, we cannot overemphasize our desire to be involved in all phases of the design of any proposed classification, performance appraisal, or pay process.

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COMPARISON OF THE PRESENT
AND PROPOSED PAY SYSTEMS

For purposes of this illustration, we will assume that an individual is to start work with GAO as an "Evaluator" on October 1, 1981 (the proposed implementation date of a "pay for performance" system). It is also assumed that this individual would be promoted under the present pay system at a rate comparable to that currently in effect.

CASE I: This individual consistently receives performance appraisals for the period indicating that he/she is a "competent" performer.

COMPETENT PERFORMER

<u>Grade</u>	<u>Promotion Date</u>	<u>Annual Salary (current system)</u>	<u>Annual Salary (proposed system)</u>	<u>Difference (from current)</u>
7	10-01-81	\$15,953	\$15,953	-
9	10-15-82	20,490	16,751	(\$ 3,739)
11	10-29-83 1-29-84 .	26,030 (26,899 if step 2)	17,588	(8,442)
12	11-12-84 8-12-85	32,759 (33,850 if step 2)	18,468	(14,291)
12/2	11/85-8/86	35,543	19,391	(16,152)
12/3	11/86-8/87	38,524	20,361	(18,163)
12/4	11/87-8/88	<u>41,713</u>	<u>21,379</u>	<u>(20,334)</u>
		<u>\$211,012</u>	<u>\$129,891</u>	TOTAL <u>(\$81,121)</u>

Basis of Calculations

Current system: Promotions as specified in the table 5% added to 10-01-81 GS pay table for starting wage (10-1-81), with 5% additions to base salary as "comparability" adjustments annually thereafter.

Proposed system: 10-1-81 salary calculated as current system with 5% annual "comparability" increases thereafter.

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CASE II: This individual consistently receives performance appraisals for the period indicating that he/she is an "outstanding" performer.

OUTSTANDING PERFORMER

<u>Grade</u>	<u>Promotion Date</u>	<u>Annual Salary (current system)</u>	<u>Annual Salary (proposed system)</u>	<u>Difference (from current)</u>
7	10-01-81	\$ 15,953	\$ 15,953	-
9	10-15-82	20,490	19,103	(\$1,387)
11	10-29-83	26,030	22,528	(3,502)
12	11-12-84	32,759	26,248	(6,511)
12/2	11-12-85	35,543	30,283 (level 3)	(5,260)
12/3	11-12-86	38,524	34,797	(3,727)
12/4	11-12-87	41,713	39,687	(2,026)
13/1	11-12-88	<u>47,349</u>	<u>44,979</u>	<u>(2,370)</u>
		<u>\$258,361</u>	<u>\$233,578</u>	TOTAL <u>(\$24,783)</u>

BASIS OF CALCULATIONS

Current system: Promotions as specified in the table above, 5% added to (10-1-80) GS pay table for starting wage (10-1-81), with 5% additions to the base salary as "comparability" adjustments annually thereafter.

Proposed system: 10-1-81 salary calculated as current system with 5% "comparability" adjustments to the base salary annually thereafter plus (level 2) 30% and (Level 3) 25% of salary range of the level. Ranges were adjusted for annual 5% movement of the range.

As these examples indicate all staff members, including the "outstanding" performers, would receive salary increases under the proposed pay system significantly inferior to the salary increases that would be expected under the present pay system.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

NOV 7 1980

TO : Director, GGD - William J. Anderson

FROM : Chairman, Career Level Council -  Bob Lewandowski

SUBJECT : Suggested Changes to the Competitive Selection System

The Career Level Council appreciates the opportunity to comment on your October 24, 1980 proposals for changes to the competitive selection process. However, we preface our remarks with our strong feeling that promotions to the GS-13 level should be excluded from competitive selection. We believe that many experienced GS-12's routinely perform work which justifies a higher grade. Other agencies, such as the Department of Housing and Urban Development and the General Services Administration, have career ladders for several professional categories to the GS-13 level. For example, management analysts in GSA with agency-wide responsibilities have a GS-13 career ladder. We also believe that many consultants and evaluators in private industry receive higher salaries than GAO's experienced GS-12 evaluators. There are many other arguments for increasing the career ladder to the GS-13 level:

- the expense associated with CSP would be significantly reduced;
- qualified candidates would be identified by those most able to do so;
- staff pay would be tied to performance, in keeping with current management philosophy; and
- the higher career ladder would serve as an interim measure pending completion of a new pay system.

Aside from the premise outlined above, we suggest that three points listed below be included in any competitive selection process. Time constraints did not allow us to comment in detail on your recent proposals or devise our own suggested system.

1. At least annually, regional and divisional management should group staff into categories reflecting promotion potential, whether or not employees are eligible for promotion. All staff have a right to know where they rank among their peers. Once a person has been categorized, she/he should be advised how she/he can rise from one category to another.

2. Promotions should be made from lists of the most qualified applicants. Management should strive to meet affirmative action goals by making lists large enough to include qualified minorities and females without random additions. Obviously, however, a limit must be placed on the size of the group of most qualified candidates. While we are not in a position to determine the point at which the cut off should be made, we believe that enough qualified minorities and women are available to meet affirmative action goals.
3. We believe regional and division management should be able to select any home unit employee from a list of most qualified applicants, rather than from a certificate prepared by a panel or by random selection. National panels should be convened to certify those top candidates who wish to move from one unit to another.

BL/ra

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 28 1981

TO : Assistant Comptroller General - Clerio P. Pin

FROM : Chairperson, Career Level Council - Bob Lewandowski

Bob Lewandowski

SUBJECT: GAO Order 0300.3, Local Travel and Transportation

Our constituents are seriously concerned that prohibiting the cost of carpools as part of local commuting expenses causes an unwarranted financial burden to individuals temporarily assigned to audit sites. GAO Order 0300.3, Local Travel and Transportation, dated September 12, 1980, specifically prohibits computation based on carpooling costs. Two examples of the policy's harmful effect are provided in Attachment I.

On January 15, 1981, Pat Iler and Bob Huston of the Career Level Council met with Stu Kline and Judy Czarsty of the Office of Budget and Financial Management to determine the reason for carpool exclusion. They were told that the exclusion resulted from perceived abuses but neither Mr. Kline nor Ms. Czarsty could identify any specific abuses.

We strongly believe that reimbursement for local travel should be based on the mode of travel the individual normally uses. While allowing carpooling costs may present some administrative control problems, the exclusion of carpools because of perceived abuses by some has the effect of punishing all carpooling employees.

We would like to discuss our concerns with you. Should you have any questions, please contact Bob Huston, LARO/CLC representative, at FTS 798-4106.

Attachment

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Example 1

An individual is in a carpool in which he drives once a week. The round trip mileage from his residence to his Official Duty Station and back is 40 miles. Therefore, the individual's actual normal commute cost is:

Round trip mileage	40
Rate per mile	.225
	<u>\$9.00</u>
Number in carpool	<u>5</u>
<u>Actual</u> daily commute cost	<u>\$1.80</u>

This individual was required to work at a temporary audit site for one month (20 days). The temporary audit site is a 90 mile round trip from his residence and he had to drive everyday. Presented below are the computations for reimbursement (1) actually received (excluding carpool commute), and (2) what would have been received using actual normal commute deductions.

	(1) Actual <u>Reimbursement</u>	(2) Reimbursement prior <u>to the Change Order</u>
1. Round trip miles to temporary audit site	90	90
2. Mileage rate	<u>.225</u>	<u>.225</u>
	\$ 20.25	\$ 20.25
3. Less commute deduction	\$ <u>9.00</u> a/	\$ <u>1.80</u>
4. Daily reimbursement	\$ 11.25	\$ 18.45
5. Reimbursement for month	<u>\$225.00</u>	<u>\$369.00</u>
Difference under GAO Order 0300.3		<u>\$144.00</u>

a/(40 miles x .225)

Example 2

An individual is in a carpool in which he drives every fourth day. The round trip mileage from his residence to his Official Duty Station and back is 65 miles. Therefore, the individual's actual normal commute cost is:

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Round trip mileage	65
Rate per mile	.225
	<u>\$14.63</u>
Number in carpool	4
<u>Actual</u> daily commute cost	<u>\$ 3.66</u>

This individual is required to work at a temporary audit site for one month (20 days). The temporary audit site is a 60 mile round trip from his residence and he has to drive everyday. Presented below are the computations for reimbursement using (1) current procedures (excluding carpool commute), and (2) what would be received using actual normal commute deductions.

	(1) Actual <u>Reimbursement</u>	(2) Reimbursement prior <u>to the Change Order</u>
1. Round trip miles to temporary audit site	60	60
2. Mileage rate	<u>.225</u>	<u>.225</u>
	<u>\$13.50</u>	\$ 13.50
3. Less commute deduction	<u>\$14.63</u> a/	\$ <u>3.66</u>
4. Daily reimbursement	\$ -0-	\$ -0-
5. Reimbursement for month	<u>\$ -0-</u>	<u>\$196.80</u>
Difference under GAO Order 0300.3		<u>\$196.80</u>

a/(65 miles x .225)

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 28 1981

TO : Director of Personnel - Felix Brandon, II

FROM : Chairperson, Career Level Council - *Bob Lewandowski*
Bob Lewandowski

SUBJECT: Evaluator Reassignments - The Formal System Doesn't Work

Many career ladder professionals would like an opportunity to work in different divisions or offices, or in different geographic locations, but have found such reassignments difficult to arrange. The CLC investigated lateral reassignment procedures for evaluators and found that there are two separate systems for arranging reassignments to other divisions or offices:

- (1) the largely unsuccessful formal Staff Assignment Program described in GAO Interim Order 2335.2, and
- (2) a relatively fruitful informal system of negotiations or staff trades arranged through networking initiated by the staff member or the Divisional staff development coordinator.

The formal evaluator reassignment program is not working properly because:

- Divisions and regional offices rarely notify the program coordinator of existing vacancies leaving no focal point for obtaining information on available vacancies.
- Hiring officials reject applicants referred to them through the formal system because of possible perceptions that the applicant wants to move because of problems or poor performance.
- Hiring officials more frequently accept applicants referred informally based upon recommendations from their peers in the applicants' home division/office.

Since informal negotiations have been more successful than formal negotiations, program coordinators have discouraged use of the formal system. We reviewed the reassignment process for the one year ending September 30, 1980, (see attachments 1 and 2) and found that only 35 percent of actual reassignments were handled through the program. Lateral reassignments could be easier to arrange if the formal process had the confidence of management and staff. Especially in an era of reduced organizational growth, opportunities

for development, alternative environments, or horizontal growth should not be hampered by difficulties in arranging assignments.

We recommend that management aggressively and publicly support the formal reassignment policy and take the following actions:

- Require division and regional management to list openings with the program coordinator prior to advertising for outside hires.
- Publish all lateral transfer vacancy listings in the Management News.
- Assure applicants' confidentiality is maintained throughout the process by:
 - a. Not requiring notification of an applicant's superiors until a potential reassignment has been located.
 - b. Maintaining a strictly confidential list of applicants and their preferred assignments with no names released without permission.
- Recognize that informal contacts can be a part of the formal system after initiation of the formal process.
- Incorporate the present FOD system for interregional reassignments into the overall system.
- Assure that program coordinators actively encourage the use of the formal system.

We would be pleased to discuss our concerns regarding this issue with you at any time and request that you keep us informed of actions that management intends to take. Please contact Council representative T.J. Sullivan at 443-3596 or Steve Scheibe at 275-6239.

Attachments

ATTACHMENT

ATTACHMENT

AUDITORS' REQUESTS FOR REASSIGNMENT

FISCAL YEAR 1980

(10/1/79 - 9/30/80)

<u>Division of auditor initiating request</u>	<u>No. of auditors requesting reassignment</u>	<u>No. of auditors reassigned from division</u>	<u>No. of auditors reassigned to this division</u>	<u>No. of transfers in & out of division</u>
CEDD	2	1	1	2
FGMS	5 <u>a/</u>	2	2	4
HRD	10	5	2	7
EMD	1	0	1	1
GGD	4	2	1	3
LCD	3	2	2	4
OIR	2	0	0	0
ID	2	2 <u>b/</u>	2 <u>c/</u>	4 <u>d/</u>
PAD	1	0	2	2
OPP	1	0	0	0
FOD	5 <u>a/</u>	5	6	11
FPCD	1	0	3	3
PSAD	3	1	0	1
Claims	1	0	0	0
OISS	1	1	0	1
OIR	<u>2</u>	<u>0</u>	<u>0</u>	<u>0</u>
TOTALS	<u>44</u>	<u>21</u>	22 <u>1</u> -to ID-Hdqtrs <u>23</u>	43 + 1 = <u>44</u>

a/One auditor requested two different times.

b/One to ID/Hdqtrs.

c/Not including one to hdqtrs.

d/+1 to ID/Hdqtrs.

ATTACHMENT

ATTACHMENT

AUDITOR REASSIGNMENTS

(6/79 - 12/80)

<u>Mo./Yr.</u>	<u>343</u>	<u>345</u>	<u>347</u>	<u>510</u>	<u>Total</u>
6/79	8	1	0	6	15
7/79	10	0	0	9	19
8/79	11	0	0	9	20
9/79	2	0	0	4	6
10/79	3	0	0	6	9
11/79	4	0	0	2	6
12/79	<u>6</u>	<u>0</u>	<u>0</u>	<u>4</u>	<u>10</u>
TOTALS	<u>44</u>	<u>1</u>		<u>40</u>	<u>85</u>
1/80	3	0	0	1	4
2/80	8	0	0	1	9
3/80	7	0	0	3	10
4/80	7	0	0	2	9
5/80	7	0	0	2	9
6/80	4	1	0	3	8
7/80	15	3	0	4	22
8/80	9	0	0	5	14
9/80	4	0	8	1	13
10/80	1	0	5	1	7
11/80	2	0	11	4	17
12/80	<u>2</u>	<u>0</u>	<u>2</u>	<u>0</u>	<u>4</u>
TOTALS	<u>64</u>	<u>4</u>	<u>26</u>	<u>27</u>	<u>126</u>

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FY 80

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

MAY 10 1981

TO : Chairperson, Career Level Council - Bob Lewandowski

FROM : Director of Personnel - Felix R. Brandon, II 

SUBJECT: Evaluator Reassignments Program

This is in response to your memorandum of April 28, 1981, Subject: "Evaluator Reassignments - The Formal System Doesn't Work."

In your memo, you make reference to the formal Staff Assignment Program described in GAO Interim Order 2335.2. At this time, a revision of that Interim Order is being developed which will address many of the concerns you outline in your memo.

The new Interim Order does not, however, provide for a "strictly confidential list of applicants and their preferred assignments with no names released without permission" and does not provide for "not requiring notification of an applicant's superiors until a potential reassignment has been located." This type of approach seems inappropriate for this program and can serve to help foster the perception that an applicant wants to move because of problems or poor performance.

The new Order outlines a more positive use of the reassignment program, and before the new Order is issued, the Career Level Council will have the opportunity to offer its comments. Thank you for your input on this matter.

cc: Mr. Pin
Mr. Fee

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

TO : Division Director or Regional Manager

THRU : Assistant Comptroller General - Clerio P. Pin

FROM : Career Level Council, Executive Committee

SUBJECT: Staff Members Holding the Position of National Career
Level Council Representative

Attached is a list of duties of your National Career Level Council Representative. This may be of particular interest to supervisor(s) of your representative.

If you have any questions, please contact me at

cc:

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 28 1981

TO : Assistant Comptroller General - Clerio P. Pin

FROM : Chairperson, Career Level Council - Bob Lewandowski

Bob Lewandowski

SUBJECT: Health and Safety

All GAO staff should work in a safe and healthy environment. Safe working conditions improve morale and enhance the professional nature of GAO. When staff work in adverse surroundings, morale and productivity fall. While our work may require occasional assignments where hazards exist, the risks should be identified and precautions taken to ensure staff safety. Currently, there is no clearly defined safety policy articulating criteria and procedures to accomplish this, nor are applicants or new employees made aware of potential exposure to safety hazards. Therefore, the CLC is concerned about hazardous assignments and adverse working environments. Some examples of these are:

- Audits of correctional facilities.
- Criminal justice audits where GAO's work adversely affects specific incarcerated individuals.
- Inspections of abandoned buildings where illegal and gang activities are commonplace.
- Reviews of toxic chemical dumps, nuclear sites, research laboratories, and munitions facilities.
- Delivery of subpoenas in high crime areas without police escort.
- Location of worksites and travel accommodations in high crime areas (for example, several assaults and robberies of GAO employees have occurred in or near worksites in regions and in Washington, D.C.).
- Offices which are poorly heated and cooled with insufficient ventilation.
- Facilities which are inadequately maintained (i.e. unsanitary restrooms, exposed wires, loose carpeting, broken chairs, rodents, and insects).

As a result of the above, we recommend GAO management address the issue of nonessential risks and communicate results and subsequent actions to all staff. The following ideas should be considered when addressing this issue.

- Assess potential health and safety hazards of assignments as part of job planning.
- Issue a supplement to job descriptions to inform staff of potential exposure to health and safety hazards.
- Conduct briefings, seminars, etc., on precautionary measures for work in correctional facilities, high crime areas, and hazardous and toxic material sites.
- Staff appropriately for such assignments (i.e. consider the location of the assignment, the probability of exposure to toxic wastes, and individual health problems, such as allergies, heart problems, emotional stress, etc.).
- Make all practical efforts to obtain staff volunteers for particularly dangerous work. Less experienced auditors, particularly trainees, should not work on such assignments.
- Improve security at all worksites.
- Conduct a survey of health and safety conditions in permanent work areas.

Should you have any questions, please contact Ms. Linda Reid, CRO/CLC representative, at FTS 353-0514.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

January 16, 1981

TO : Assistant Comptroller General - Clerio P. Pin

FROM : Chairman, Career Level Council - *Len Baptiste for*
Bob Lewandowski

SUBJECT: Selection Process for Personnel Appeals Board

On December 12, 1980, Len Baptiste and Sheila Kraus of our Ad Hoc Committee met with Pat Nobles, Group Manager of the Personnel Policy and Programs Group, to discuss the appointment of members to the GAO Personnel Appeals Board. At this time, we are particularly interested in the selection process which will be used to fill the position vacated when the one-year appointment expires October 1, 1981. We expressed our desire to be included in a more active capacity in the selection of this appointee than we had in the selection of the entire Board. Mr. Nobles indicated that your Office is in the process of formulating procedural guidelines for future appointments to the Board and asked that we provide you with a written summary of our suggestions. We welcome this opportunity to discuss the appointment process and the potential for CLC input.

At the outset, it should be noted that the GAO Personnel Act of 1980 provides for participation of employee groups such as CLC in this selection process. Section 4(a)(2)(B) provides that each appointment to the Board be made by the Comptroller General ". . . after consultation with organizations which represent employees of the General Accounting Office . . ." "Consultation" has been defined by courts as the deliberation of two or more parties on some matter, or a council or conference to consider a particular issue, encompassing the idea of seeking the opinion or advice of another party or applying to that party for information or instruction in order to arrive at a decision. See, for examples, Dunbar v. Fant, 170 S.E. 460, 90 A.L.R. 1412; Teplitsky v. City of New York, 133 N.Y.S. 2d 260, 261; C.I.R. v. John A. Wathen Distillery Co., C.C.A., 147 F 2d 998, 1001. Given this definitional understanding, the use of the word "consultation" in the legislation provides for some participation in the selection process for employee groups between the extremes of "veto" and "rubber stamp."

Mr. Nobles indicated that one idea under consideration was the creation of a selection panel to deal exclusively with the screening of applicants for Board positions. One individual would serve as the central contact/chairperson of this panel, which would make the ultimate recommendation to the Comptroller General. Our main concern is that this individual, as well as the panel members, not be associated with the Comptroller General's office. We suggest that you consider designating some third party to chair the panel.

We are also interested in the screening procedures used by this panel in evaluating candidates. After soliciting recommendations from the various organizations and reviewing the resumes, we suggest that the candidates with the best five resumes be interviewed to better assess their qualifications.

There are several ways in which CLC can make worthwhile contributions to the selection process. Ideally, one member of the selection panel would be elected by the combined executive committees to represent their various employee groups.

Short of this, there are other points in the process where we could effectively participate. Initially, we could submit the names of the organizations we wish to be canvassed for applicants, as we did in the past. Secondly, we could submit questions for the structured interviews of the five finalists based on our review of their resumes. This review and their answers to our questions would enable us to provide you a ranking of the candidates to be included in your selection recommendation to the Comptroller General. Finally, we would request biweekly status reports by the selection panel throughout the entire selection period (i.e., from the initial consideration of appropriate organizations to the final recommendation).

We hope that our suggestions will assist your group in arriving at a selection procedure agreeable to management and employees alike. We would be pleased to discuss this further with you if you have any questions or comments. Please contact Len Baptiste at the Washington Regional Office, 426-7939.

cc: Pat Nobles, Personnel
Bob Lewandowski, Pittsburgh R.O.
Len Baptiste, Washington R.O.
Melissa Van Tine, Norfolk R.O.
Sheila Kraus (OGC)

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

FEB 18 1981

TO : Chairpersons, CLC, EEOAC, HAC, MPAC
and WAC

FROM : Director of Personnel - Felix R. Brandon, II ^{Felix R. Brandon, II}
(signed)

SUBJECT: Proposal to Improve Consultation by Employee Groups--
GAO Personnel Appeals Board

Since the selection of the current members of the GAO Personnel Appeals Board, discussion has been held at various levels on ways to improve consultation by employee groups in future actions. As you know, one current board member's term will end on September 30, 1981, and a plan of action for the screening of a replacement is essential by early June 1981. We are proposing for your consideration the following process:

I. Designate a Screening Panel with the following composition:

- a. Assistant Comptrollers General (3);
- b. General Counsel;
- c. Director, Civil Rights Office;
- d. Chairperson, Personnel Appeals Board; and, either,
- e. Director (of an Operating Division), or
- f. Representative of Employee Councils (to be selected by the 5 Chairpersons or the full membership of the councils.)

The responsibilities of the Panel would include:

- a. Select a chairperson;
- b. Review and approve the names of organizations and individuals to be solicited for nomination (including those referred by employee groups);
- c. Establish administrative requirements for submission of nominations (e.g. form and extent of resumes, time-frames for reply, etc.);
- d. Screen all nominations which satisfy minimum requirements and decide on a list of no more than 3 candidates for each vacancy;
- e. Participate in all candidate interviews; and
- f. Arrange and finalize the consultation and appointment process.

II. Designate a non-voting Executive Secretary to serve as the focal point for administrative coordination between the Comptroller General, the Screening Panel, employee groups, congressional committees (through the Office of Congressional Relations), and nominating organizations and individuals on all

matters relating to the solicitation, nomination, screening, consultation and appointment process. More specifically to:

- a. Provide administrative support for the panel, schedule meetings, prepare agenda and take action on the decisions of the Panel;
- b. Consult with employee groups to identify organizations and individuals to be included in the solicitation process;
- c. Prepare all necessary correspondence in the solicitation, screening, consultation and recommending process;
- d. Coordinate interviews of potential nominees to ascertain qualifications, including arranging the participation of employee representatives in those interviews;
- e. Arrange for applications of nominees to be provided to employee representatives for the interviews;
- f. Coordinate the final consultation process with the full membership of employee groups and the appropriate congressional committees before referral of final nominees to the Comptroller General;
- g. Coordinate with Personnel the appointment of Board members selected by the Comptroller General;
- h. Notify all organizations and nominees of the final selection(s); and
- i. Maintain appropriate records and files documenting the selection process.

III. Employee groups will:

- a. Select a common representative to serve on the screening Panel (if that option is chosen);
- b. Promptly provide lists of organizations and individuals to be solicited for nominees upon request of the Panel;
- c. Designate individuals to participate in interviews of nominees; and
- d. Promptly consider and advise the Panel, in writing, of their recommendation on the final nominees.

This process will commence upon notification of the resignation of a Board member, or not later than three months prior to the conclusion of any Board member's term of office. The composition of the Screening Panel and the responsibilities of the parties will be published as a GAO Order.

I would like to receive your written comments on this proposal by April 1, 1981. If it would be helpful, Pat Nobles of my staff is available to discuss this proposal with you individually or to arrange a group meeting.

cc: Mr. Pin (OCG)
Mr. Gallas (PAB)

J. McGrath/P. Nobles (X55840) 1a/2/17/81

J. McGrath, attn

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UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

March 19, 1981

TO : Director of Personnel - Felix R. Brandon, II

Bob Lewandowski

FROM : Chairman, Career Level Council - Bob Lewandowski

SUBJECT: CLC Response to GAO's Proposal to Improve Consultation
by Employee Groups--GAO Personnel Appeals Board.

We welcome the opportunity to comment on your February 18, 1981, proposal. The Council was very pleased with the proposal because it responded well to our concerns raised in the Council's January 16 memorandum to Mr. Pin. Even though we are pleased with the proposal we feel that a few minor revisions would add clarity and assist us in representing our constituency which is a large percentage of GAO's staff. The revisions include the following:

- The Council does not believe that the representative of the employee councils should be an either/or choice. The Council believes that an employee representative should be on the Screening Panel for every selection.
- Throughout the proposal it is difficult to determine the differences (if any) between nominees and candidates. To be consistent with the GAO Personnel Act of 1979, the Council recommends that the words, "nomination," "nominations," "potential nominees," and "nominees," all be changed to the word "candidates." We also feel that the term, "nominating organizations," could better be described as, "organizations submitting candidates."
- In four places the proposal says "and individuals." The Council feels that this is also inconsistent with the GAO Personnel Act of 1979 and, therefore, should be deleted.

We again hope that our suggestions will assist in arriving at a selection procedure agreeable to management and employees alike. We would be pleased to discuss this further with you if you have any questions or comments. Please contact Len Baptiste at the Washington Regional Office, 633-0145.

cc: Clerio P. Pin, Assistant Comptroller General
Pat Nobles, Personnel

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

*Memorandum*MAY 8 1981TO : Chairpersons, CLC ✓, CRAC, HAC, MPAC, AND WACFROM : Director of Personnel - Felix R. Brandon, II SUBJECT: Process for Selection of New Members
of the GAO Personnel Appeals Board

We have reviewed your comments on our proposal of February 18, 1981, to improve employee participation in the subject process. There were a number of concerns raised about whether employee representatives on the candidate screening panel be voting or nonvoting members and, if voting members, whether the councils could thereby be compromised in the later consultation phase. Because it is our desire to have responsible employee representatives participate in the candidate screening process, we have decided to have a representative of each of your groups participate. These representatives will then be able to communicate with the councils on that process, within reasonable bounds respecting the privacy of all candidates, and to assist them in their consultation role pursuant to the provisions of the GAO Personnel Act.

To avoid compromising the final decision of the full councils, the five representatives will be fully participating, nonvoting, members of the candidate screening panel. The employee representatives will participate in the deliberations of the panel and assist in any interviews to determine the merits of the experience, qualifications and aptitude of each prospective candidate against the criteria set out in the GAO Personnel Act. We have also modified the responsibilities of the screening panel, executive secretary to the panel and employee groups to reflect other suggestions made by the councils.

I am requesting that each council notify Dominic G. DelGuidice, who has been designated as the executive secretary to the panel, of the representative of their choice by June 1, 1981. The executive secretary to the panel will communicate with you further about fulfilling other requirements in connection with the selection process. Should any council be unable to designate a representative by the assigned date, however, the selection process will proceed on schedule.

Attachment - Process for Selection of New Members of
the GAO Personnel Appeals Board

Attachment

PROCESS FOR SELECTION OF NEW MEMBERS
OF THE
GAO PERSONNEL APPEALS BOARD

I. Designate a Screening Panel with the following composition:

- a. Assistant Comptrollers General (3);
- b. General Counsel;
- c. Director, Civil Rights Office; and
- d. Five (nonvoting) representatives, one from each of the Employee Councils (to be selected by the councils).

The responsibilities of the Panel would include:

- a. Select a chairperson;
- b. Review and approve the names of organizations to be solicited for candidates (including those referred by employee groups);
- c. Establish administrative requirements for submission of candidates' papers (e.g. form and extent of resumes, time-frames for reply, etc.);
- d. Screen all candidates which satisfy minimum requirements and decide on a list of no more than three candidates for each vacancy to be referred for consultation;
- e. Conduct candidate interviews; and
- f. Arrange and finalize the consultation and appointment process.

II. Designate a nonvoting Executive Secretary to serve as the focal point for administrative coordination between the Comptroller General, the Screening Panel, employee groups, congressional committees (through the Office of Congressional Relations), and organizations submitting candidates on all matters relating to the solicitation, screening, consultation and appointment process. More specifically to:

- a. Provide administrative support for the panel, schedule meetings, prepare agenda and take action on the decisions of the Panel;
- b. Consult with employee groups to identify organizations to be included in the solicitation process;
- c. Prepare all necessary correspondence in the solicitation, screening consultation and appointment process;
- d. Coordinate interviews of potential candidates to ascertain qualifications.
- e. Coordinate the final consultation process with the full membership of employee groups and the appropriate congressional committees before referral of final candidates to the Comptroller General;
- f. Coordinate with Personnel the appointment of Board members selected by the Comptroller General;

- g. Notify all organizations and candidates of the final selection(s);
and
- h. Maintain appropriate records and files documenting the selection process.

III. Each Employee Group will:

- a. Select a representative to serve on the Screening Panel;
- b. Promptly provide lists of organizations to be solicited for candidates upon request of the Panel; and
- c. Promptly consider and advise the Panel, in writing, of their recommendation on the final candidates, pursuant to the consultation provisions of the GAO Personnel Act.

This process will commence upon notification of the resignation of a Board member, or not later than three months prior to the conclusion of any Board member's term of office. The composition of the Screening Panel and the responsibilities of the parties will be published as a GAO Order.

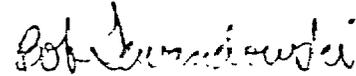
UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

OCT 11, 1961

TO : Chairman, Screening Panel for PAB Members -
Harry S. Havens



FROM : Chairman, Career Level Council - Bob Lewandowski

SUBJECT: Appeals Board Selection

The Career Level Council welcomes the opportunity to recommend five nominees for the next Appeals Board opening. Our five nominees in order of preference are:

1. Ismene Kalaris
2. L. Lawrence Schultz
3. Robert J. Ables
4. Robert T. Simmelkjaer
5. Janice Niemi

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

SEP 19 1980

TO : Special Assistant to the Comptroller General -
Clifford I. Gould

FROM : Chairperson, Career Level Council - Karen Baker *Signed for*

SUBJECT: GAO Draft Order 2711.1 - Labor Management Relations

We welcome the opportunity to comment on Draft Order 2711.1 entitled Labor Management Relations. The GAO Personnel Bill provides that the GAO personnel system provide for procedures to ensure that each employee of the GAO has the right, freely and without fear of reprisal, to form, join, and assist an employee organization or to refrain from such activity. The act also mandates that the GAO personnel system provide for a labor-management relations program, consistent with chapter 71 of title 5, United States Code.

We believe the changes that have been made in Draft Order 2711.1 from title 5, chapter 71, have severely curtailed employees' rights in joining and being represented by an employee organization. Also, the changes that have been made expand management rights beyond the scope of title 5, chapter 71. Therefore, we are strongly urging you to adopt the changes that we recommend so that GAO employees have the same rights to join and be represented by an employee organization as do the rest of Government employees as required by the GAO Personnel Act.

cc: Mr. Pin, Office of
Comptroller General

Section 1. Definitions, Application

(f) "supervisor"

Change 1: Delete the paragraph beginning with "All GS-13s."

Reason: GS-13s and above are not necessarily supervisors as defined in (f) and arbitrarily defining them as supervisors would limit employees' rights to effectively organize.

(o) "conditions of employment"

Change 2: Delete (3).

Reason: We believe that pay and number of hours worked (including the length of lunch hour, flextime) are conditions of employment that should be negotiable. Also 5 U.S.C. § 7103(14) does not contain such an exclusion.

Section 2. Employees' rights

(b) Line 6

Change 3: After the words "personnel work" add "except employees of the Office of General Counsel."

Reason: There are OGC employees in Personnel Law Matters who should not be excluded from management of a labor organization just because they perform "personnel" work.

(c) Conflict of interest

Change 4: Delete (c)(1) and (2).

Reason: The CLC does not believe that the potential conflict of interest is important enough to deprive GAO professionals from joining an existing union. This section virtually guarantees that there will be an ineffective, if any, employee organization for GAO employees.

Change 5: A section may be added which states that "To avoid conflicts of interest and the appearance of conflicts of interest, employees classified as GAO Evaluators, employees otherwise classified who are performing comparable auditing work, and employees classified as Attorney-Advisers who are members of an employee organization may not participate in an audit of an employee organization that they are a member of.

Reason: This section adequately addresses the conflict of interest issue.

Section 4. Management rights

(a)(3)

Change 6A: Delete.

Change 6B: Add a new section (b)(3) which reads (3) "at the election of the GAO, on the numbers, types, and grades of employees or positions assigned to any organizational subdivision, work project, or tour of duty, or on the technology, methods and means of performing work."

Reason: The changes conform to 5 U.S.C § 7106.

(a)(4)(c)

Change 7: Delete.

Reason: This management right is not given in 5 U.S.C. § 7106.

Section 5. Exclusive recognition of labor organizations

(a) - Last three lines.

Change 8: Delete the last three lines.

Reason: This is an addition which is different from 5 U.S.C. § 7111(a) and appears to be designed to prevent a labor organization from getting exclusive recognition. In elections, you should not consider people who do not vote.

(b)(1)(B)

Change 9: After the words "exclusive representative" add the phrase "that 30 percent of the employees in the unit allege."

Reason: This change conforms to 5 U.S.C. § 7111 and prevents one employee from capriciously petitioning the board.

(b)(2)

Change 10: Delete

Reason: It is never up to management to decide whether a union is representing workers. Such language is not in 5 U.S.C. § 7111.

After (b)(3)

Change 11: Add the following language: "The Board shall investigate the petition, and if it has reasonable cause to believe that a question of representation exists, the Board shall supervise or conduct an election on the question by secret ballot and shall certify the results."

Reason: This is similar to 5 U.S.C. § 7111(b)(2) and sets forth what to do when a petition is filed.

Section 6. Determination of appropriate units for labor organization representatives

(a) - Line 6.

Change 12: After the word "GAO" and before "provided" add "and will ensure the fullest freedom in exercising their rights guaranteed under this order."

Reason: This is language from 5 U.S.C. § 7112(a)(1) and shows that the appropriate unit question is crucial in exercising their rights.

(a)(1), (a)(2), and (a)(3)

Change 13: Delete.

Reason: These "minimum appropriate units" would make it difficult for employees to organize because it would make communication and coordination between wide geographically dispersed employees extremely difficult and expensive, and, therefore, restricts their rights. The appropriateness of the unit is up to the Board and not GAO management.

Section 9. Unfair Labor Practices

(a)(5) - First line.

Change 14: Between the words "to" and "negotiate" add "consult or."

Reason: Consultation with an employee organization is important for good labor relations. 5 U.S.C. § 7116(5) has "to consult."

(b)(5)

Change 15: Delete.

Reason: 5 U.S.C. § 7116 does not contain such an unfair labor practice and employee organizations would be restricted.

(b)(6)

Change 16: Between "to" and "negotiate" add the words "to consult."

Reason: Same as for change 14.

Section 11. Resolution of negotiating impasses

11.(a)(2)

Change 17: Add at the end "provided that such person is not otherwise affiliated with GAO or the exclusive representative."

Reason: To ensure one neutral is in the impasse proceedings.

Section 14. Grievance Procedures

(c)(3)

Change 18: Add after the word "appointment" "except that the methods used in determining the foregoing may be grieved if it is believed that they are not fair and equitable or are arbitrary and capricious."

Reason: To ensure that the process is fair.

(d)

Change 19: Change this section to read:

"An aggrieved employee affected by discrimination on the basis of race, color, religion, age, sex, national origin, political affiliation, marital status or handicap condition may raise the matter under GAO Order 2713.1 or the negotiated procedure, but not both. An employee shall be deemed to have exercised his option under this section to raise the matter at such time as the employee timely initiates an action under GAO order 2713.1 or timely files a grievance under procedures of the parties' negotiated procedure, whichever event comes first."

Reason: This election of remedies follows 5 U.S.C. § 7121(d).

Section 15. Exceptions to arbitral awards

After (a)(2)

Change 20: Add:

"The Board may take such action and make such recommendations concerning the award as it considers necessary, consistent with applicable laws, rules, and regulations."

Reason: This gives the Board authority to correct arbitration awards. See 5 U.S.C. § 7122(a).

Section 12. Prevention of unfair labor practices

(b)

Change 21a: First line after labor organization
add the words "or management"

Second line after section 9(b)(7) add
the words "or 9(a)(6)"

Change 21b: Fourth line after organization add the
words "or management"

Fifth line after 9(b)(7) add the words
"or 9(a)(6)"

Reason: These changes allow a labor organization
the same rights as management to petition
the Board.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

January 16, 1981

TO : Director, Personnel System Project - Charles Schuler

FROM : Chairman, Career Level Council - Bob Lewandowski

Len Baptiste for

SUBJECT: GAO Order 2711.1, Labor Management Relations

In September 1980 we sent a memorandum to Clifford Gould, then Special Assistant to the Comptroller General, outlining our comments on Draft Order 2711.1, Labor Management Relations. In this memorandum we detailed some concerns we had with the sections severely curtailing employees' rights in joining and being represented by an employee organization. Attached is a copy of that memorandum.

On October 1, 1980, the final GAO Order 2711.1 was issued. This Order does not reflect any of the changes we suggested. Moreover, we did not receive a written response to our comments or an explanation of why the policy expressed in the draft Order remained unchanged. There was a written response sent to the GS-13/14 Management and Policy Advisory Council but since their concerns were somewhat different from ours the answers provided therein were not helpful to us.

At this point we request that you review and respond to our earlier comments. If you have any further questions, please contact Len Baptiste of the Washington Regional Office, 426-7939.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

January 27, 1981

TO : Heads of Divisions and Offices
and Individuals

FROM : Personnel Project System,-
C. A. Schuler *C. A. Schuler*

SUBJECT: Disposition of Comments on Draft
Order 2711.1 "Labor Management Relations"

Comments and recommendations concerning the draft order on labor-management relations were received from 19 GAO entities. As a result of the comments and suggestions, the final order was modified in many respects. The following provides a summary of the majority of substantive comments and their disposition.

RECOMMENDED REVISIONS INCORPORATED IN THE ORDERParagraph 3. Definitions and their Application

1. One comment was received recommending that experts and consultants should be excluded from the definition of "Employee" in subparagraph e., thereby excluding individuals in these categories from bargaining units. This exclusion is consistent with the Federal sector practice, and therefore the recommendation was adopted.
2. One commenter expressed concern over the definition of "Management Official" contained in subparagraph g. Under the definition in the draft order, individuals would have been management officials if they were in positions which authorized them to "formulate, determine, or influence the policies of GAO." By various means, GAO has encouraged all employees (particularly those involved in audit work) and employee groups to influence the policies of GAO, and to actively participate in the management process of proposing and debating GAO policies and procedures. There appeared to be a conflict between GAO's encouragement of this participation and the definition of "management official" in the order. In view of this, the word "influence" was deleted from the definition.
3. Subparagraph j. (1)
The word "religion" was substituted for the word "creed," in order for the paragraph to correspond to general affirmative action and EEO terminology.

Paragraph 4. Employee Rights1. Subparagraph c.

The language "employees classified as GAO Evaluators, employees otherwise classified who are performing comparable auditing work" was modified to remove the word "auditing." Prior to the modification, the paragraph could have been interpreted to imply that clerical or support employees who assist evaluators could not be represented by a union which represents other Federal, State, or local employees. The word "auditing" was removed to make it clear that only individuals performing work comparable to actual auditing are covered by this paragraph, but that clerical and support employees are not.

2. Subparagraph c. (1)

The language "represents individuals employed by the Federal Government" was modified by inserting the word "other" between "represents" and "individuals." The purpose of this modification was to correct a conflict in the language of this paragraph which could have been interpreted to mean that GAO Evaluators and Attorney-Advisers could not possibly join or be represented by a labor organization. The word "other" was inserted to make it clear that the word "individuals" used in this paragraph did not include GAO Evaluators or Attorney-Advisers.

Paragraph 6. Management Rights

One commenter indicated that many of the management rights in paragraph 6 were more appropriately related to supervisory functions, rather than management functions.

In order to demonstrate that the rights contained in paragraph 6 are not exclusively those of management officials, the language "and as appropriate supervisors" was inserted after the term "management official," throughout paragraph 6.

Paragraph 7. Exclusive Recognition of Labor OrganizationsSubparagraph b. (1) (b)

The language ".30 percent of the employees in the unit allege that" was inserted. It had been inadvertently omitted.

Paragraph 8. Determination of Appropriate Units for Labor Organization Representation

1. Subparagraph a.

The language "and will ensure the fullest freedom in exercising their rights guaranteed under this order" was inserted into the paragraph for consistency with the practice in the Federal sector.

2. Subparagraph (c)(7) of the draft order provided professional employees with the opportunity to decide by ballot whether or not they would be included in a bargaining unit with non-professional employees. This was consistent with Title VII of the Civil Service Reform Act (CSRA) and private sector practice. A recommendation was made to modify the subparagraph to also provide non-professional employees with the opportunity to choose by ballot whether or not they want to be included in a unit of professional employees. This recommendation was adopted because, as contrasted to the usual private or public sector situation in which the majority of employees are non-professional, the majority of GAO employees are professionals. Without this revision, it would have been possible for professional employees to prevail over non-professionals in determining that there should be a combined unit even if the latter group were strongly opposed.

Paragraph 9. Representation Rights and Duties

1. Subparagraph f. (4) concerns GAO's obligation to furnish various types of data to an exclusive representative for purposes of collective bargaining, if it is not prohibited by law to provide such data. This subparagraph was expanded, as a result of a comment, to include the provision that such data may be withheld if prohibited by "regulation, or Executive order." This additional language was incorporated into the order to authorize withholding information for national security or other valid reasons.

Paragraph 11. Unfair Labor Practices

Subparagraph b. (4)

The word "religion" was substituted for the word "creed" in order for the paragraph to correspond to general affirmative action, EEO terminology.

Paragraph 12. Duty to Bargain in Good Faith; Compelling NeedSubparagraph a.

The words "for the rule, regulation order" were deleted, and the words "to preclude negotiations on the rule, regulation, or order," were inserted. With this revision, management must demonstrate that there is a compelling need to preclude bargaining on a particular rule, regulation or order, rather than a compelling need for the rule, regulation or order, if it invokes a compelling need argument.

Paragraph 13. Resolution of Negotiating Impasses1. Subparagraph a.

The words "an ad hoc" were inserted in this paragraph to clearly show that the Joint Management-Union Committee will not be a standing committee, but will only be established when an impasse arises.

2. Subparagraphs d.(1), d.(2), and f.

The language "or the exclusive representative" was inserted after the words "an individual not employed by GAO," in order to provide that a mediator or fact-finder cannot be employed by GAO or by the exclusive representative. The draft order had prohibited only someone employed by GAO from serving in those capacities.

3. Subparagraph j.

This subparagraph concerns the arbitration of impasse disputes and who will arbitrate the disputes. The draft order provided that the joint management-union committee would arbitrate disputes, or designate its chairperson to do so. Several comments were received recommending various modifications to this provision. Commenters were concerned that the management and union committee members would elect to stay with their respective parties' positions, thus disagreeing on impasse resolution decisions. To avoid this situation, the final order provides that the chairperson of the committee, who being the Chair of the GAO Personnel Appeals Board is an independent third party, or the Chairperson's designate, would arbitrate impasse disputes.

Paragraph 14. Prevention of Unfair Labor Practices

One commentor suggested that the order should clearly provide that there is no automatic right to a hearing before the GAO Personnel Appeals Board in cases of unfair labor practice charges, and that the Board could dismiss unmeritorious or untimely filed complaints.

This provision is consistent with practices in the Federal and private sectors, and therefore was added as subparagraph g. of paragraph 14.

Paragraph 18. Judicial Review

The last sentence of this paragraph read, "Any such appeal shall be in accordance with the procedures of chapter 158 of title 28, United States Code." This sentence was revised to read, "Any such appeal shall be in accordance with Section 4 (1) of the act. Section 4 (1) of the act defines and limits the procedures for, and scope of, judicial review of Board decisions. The revised language would put all the parties on notice of this fact, especially employees and their attorneys, and should avoid creating the impression that general jurisdictional standards or a broader scope of review used in other cases at the Court of Appeals level may apply in GAO cases.

RECOMMENDATIONS NOT INCORPORATED IN THE ORDERParagraph 3. Definitions and Their Applications

1. Several suggestions were made to delete the portion of subparagraph f. stating that all GS-13's and above performing auditing work are presumed to be supervisors. The purpose of this subparagraph is to ensure that auditors who perform supervisory functions, even if not on every assignment, are not included in bargaining units with the employees they supervise. This presumption, however, is subject to rebuttal by the individual employee. It should be noted that an employee need only to exercise one or more--not necessarily all--of the functions in the definition to be a supervisor.
2. A recommendation was made that the words "personnel and/or" be inserted directly before the words "labor-management relations," in subparagraph h. This suggestion would, in effect, place personnel employees in the category of confidential employees, and thereby exclude them from participation in the management of a labor organization, or acting as a representative of a labor organization. As paragraph 4, subparagraph b. does not

authorize individuals engaged in personnel work in other than a purely clerical capacity from participation in labor organization management or representation, the suggested language was felt to be unnecessary.

3. One recommendation was made that subparagraph o.(3) be revised to include pay and number of hours worked (including the length of lunch hours and flexitime) under "conditions of employment," thereby making these matters subject to negotiations. In most Federal agencies, these matters are specifically provided for by Federal statute, and are therefore not subject to collective bargaining. Section 3.(c) of the GAO Personnel Act of 1980 clearly provides that the pay rates of GAO employees shall be fixed by the Comptroller General consistent with the principles of section 5301(a) of Title 5, United States Code. Since section 5301(a) embodies the principle of equal pay for work of substantially equal value, subjecting pay rate determinations to negotiations could result in a situation where individuals who are performing similar work but are in different bargaining units would receive different levels of compensation. This variable treatment in the pay rates of employees would be inconsistent with the requirements of the Act, and, therefore, pay setting was determined to be nonnegotiable. Along this same line, negotiations on the total number of work hours could also result in variations and inconsistencies between bargaining units, therefore, this subject was determined to be nonnegotiable.
4. Several recommendations were submitted suggesting modification of subparagraph p., "Grievance." The GAO order defines "grievance" as "any complaint concerning the interpretation or application of a collective bargaining agreement." The suggestions concerned modifying the definition to include any matter relating to employment conditions subject to the control of GAO management, and which are not precluded from collective bargaining by law, rule, or regulation. The definition contained in the order is consistent with definitions used in state, local, and private sector labor relations. As it provides unit employees with grievance procedures commensurate in scope with the collective bargaining agreement of which the grievance procedures are a part, it should encourage parties to negotiate over matters which they desire covered by those procedures.

Paragraph 4. Employees' Rights

1. Several comments were made concerning subparagraph c., which provides that GAO Evaluators, employees who are performing comparable work, and Attorney-Advisors are not eligible to be represented by a labor organization, or is affiliated directly or indirectly with a labor organization, which represents other Federal, State, or local employees. It was recommended that this provision be deleted to permit individuals in these positions to be represented by any labor organization. This requirement was placed in the order to avoid conflicts of interest, or the appearance of conflicts of interest, which might affect the acceptance of GAO audit work and reports. Therefore, no change was made. Also, substitute language was suggested that provided that individuals in these positions may not participate in audits of employee organizations of which they are members. This change was not made, because it would infringe upon management's right to assign work to employees, and, in addition, because it does not sufficiently address the conflict of interest problem.
2. One suggestion proposed that subparagraph c. contain a list of those unions which would be allowed to represent GAO Evaluators and Attorney-Advisors. Since the order is regulatory in nature, this type of list would not be appropriate or practical. It would also place additional limitations, beyond those contained in the draft order, on which labor organizations could represent these employees.
3. A suggestion was made that the term "conflict of interest" be defined. Since no definition could encompass all situations and circumstances that could be deemed a conflict of interest, it was felt that such determination should be made by the GAO Personnel Appeals Board on a case-by-case basis.

(NOTE: Although not contained in this paper, several commenters suggested that various terms contained in the order be defined. No definitions were included with the suggestions. The terms were not defined based upon the reason described in 3. above.)

Section 5. Powers and Duties of the Board Under the Labor-Management Relations Program

1. It was recommended that after the word "prescribe" in the introductory paragraph, the phrase "consistent with such practices and techniques used by the Board's coun-

terparts in the public and private sectors" be added. This suggestion would have restricted the Board's discretion in making decisions and deciding issues relegated to it by the GAO Personnel Act of 1980. As there is no requirement that the Board's determinations must be consistent with determinations made in the public and private sectors, the Board should be free to do so, or not do so, as it sees fit.

Section 6. Management Rights

1. It was recommended that "at the election of GAO," negotiations be permitted on those matters contained in subparagraph a.(3). In the order, these matters are retained management rights, not subject to negotiations. It was determined that although these matters can be negotiated at management's discretion in those agencies covered by the Title VII, CSRA, GAO management did not intend to expand the scope of negotiations in the GAO order to encompass these subjects. To suggest in the order that GAO might elect to bargain on those subjects would create false hopes. Therefore, no change was made. It should be noted that, consistent with the practice in the rest of the Federal sector, GAO is obligated to negotiate with an exclusive representative concerning the implementation and impact on unit employees of any decision it makes concerning these matters.
2. A suggestion was made to delete subparagraph a.(4)(c), which deals with management's right to determine, establish, and revise personnel policies, practices, and matters affecting working conditions, which in other agencies are subject to Government-wide rule or regulation.

This recommendation was not accepted because this subparagraph provides GAO with the ability to apply government-wide rules and regulations in the same fashion as other Federal agencies, i.e., without requiring negotiations with labor organizations.

Paragraph 7. Exclusive Recognition of Labor Organizations

1. A recommendation was made to delete subparagraph b.(2), which provides that GAO may file a petition with the Board when it has doubt that a certified labor organization represents a majority of employees in the unit, or that there is a substantial change in the scope and character of the unit.

This suggestion was not adopted because procedures by which management can petition, based on objective reasons, to decertify a labor organization are integral parts of most labor relations programs. This procedure is provided to other Federal agencies under the Federal Labor Relations Authority's Rules and Regulations.

2. A suggestion was made that subparagraph d. be modified to reflect that the Board shall determine who is eligible to vote and establish rules governing representational elections, "subject to traditional labor relations practices." This suggestion would restrict the Board in establishing its operating procedures, specifically, how it would conduct elections. Therefore, the suggestion was not implemented.

Section 8. Determination of Appropriate Units for Labor Organization Representation

1. Several commenters recommended that the provisions for the minimum appropriate units, contained in subparagraph a., be broadened in order for each regional office to be considered an appropriate bargaining unit, or suggested that the subparagraph be deleted entirely.

These recommendations were not adopted because it could well lead to fragmentation of bargaining units. The numerous units that could result would greatly hamper GAO's ability to effectively negotiate in a consistent and equitable manner, and would be therefore detrimental to the labor relations program.

Paragraph 9. Representation Rights and Duties

1. A commenter suggested that the order provide for national consultation rights. Under Title VII, CSRA, national consultation rights are provided so that in very large agencies where appropriate units for representational purposes are likely to be far smaller than nation-wide in scope, unions with substantial support on an agency-wide basis, but having exclusive recognition only for some units, can discuss matters of agency-wide impact with management. In GAO, the minimum appropriate units are large in scope, and there is little need to provide consultation rights to unions which have insufficient support to achieve exclusive recognition.

Paragraph 13. Resolution of Negotiating Impasses

Several recommendations were made for revising the impasse resolution procedure.

1. It was suggested that the impasse resolution procedure be revised to permit the Board to prescribe impasse procedures, and appoint individuals as mediators, fact-finders or arbitrators. Since the GAO Personnel Act does not specify that the Board establish impasse resolution procedures, GAO adopted procedures that have been successful in State and local labor relations programs, and tailored the procedures to fit GAO's needs.
2. It was recommended that time limits be established for the crucial phases of the impasse resolution procedure. However, specific time frames would be contrary to the intent of the procedure, which is to provide the parties to collective bargaining a number of opportunities, and extensive latitude, to resolve impasses themselves, prior to a resolution being imposed upon them by an arbitrator.

Paragraph 14. Prevention of Unfair Labor Practices

1. A suggestion was made that the order should clearly provide for a hearing by the Board on a complaint rather than making hearings optional at the discretion of the Board. Consistent with the practice in the Federal and private sectors, the GAO program does not provide an automatic right to a hearing in unfair labor practice cases. This is designed to avoid the utilization of resources for non-meritorious cases.

Paragraph 16. Grievance Procedures

1. A recommendation was made to delete subparagraph c. (3) in order that any examination, certification, or appointment could be grieved if it is believed that the methods used in determining these types of personnel actions are not fair and equitable or are arbitrary and capricious.

This suggestion involves candidates for positions in GAO, and not employees actively on the GAO rolls. Since candidates for GAO positions would not be members of bargaining units, they would be ineligible to process grievances through a negotiated grievance procedure. Therefore, GAO has followed the practice utilized in the Federal sector of excluding these matters from negotiated grievance procedures.

2. One suggestor recommended that subparagraph d. be revised to permit employees to process discrimination complaints through a negotiated grievance procedure.

There were several reasons for excluding complaints of discrimination from negotiated grievance procedures. First, a great deal of confusion can result from the availability of two separate procedures for protesting a particular type of action. Having two procedures could result in different settlements for similar complaints, depending upon which of the two avenues complainants decided to pursue. Also, past experience in the Federal sector has demonstrated that discrimination complaints would be more expeditiously processed through a discrimination complaint procedure, rather than through a grievance procedure. Finally, employees would receive no less due process under a discrimination complaint procedure than they would under a negotiated grievance procedure.

TO: Robert W. Lewandowski - Chair, Career Level Council
Tyrone D. Mason - Chairman, EEO Advisory Council
Ralph Block - Chair, GS-13/14 Management and Policy
Advisory Council
Gerald Goldberg - President, Handicapped Advisory
Committee
Karen Gray - Chair, Women's Advisory Committee
Regional Coordinators for the Personnel Systems Project
Patricia A. Moore - Deputy Director, Personnel
F. Henry Barclay - Associate General Counsel,
Personnel Law Matters, Office of General Counsel

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UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

January 16, 1981

TO : Director, Personnel System Project - Charles Schuler

FROM : Chair, Career Level Council - Bob Lewandowski

Lin Baptiste for

SUBJECT: Draft GAO Order 2511.1, Classification

We appreciate the opportunity to comment on draft GAO Order 2511.1. Except for chapter 4, we feel relatively comfortable with this Order. Chapter 4, is unclear regarding what constitutes official notice and to what extent the employee is made aware of his/her appeal procedures. We recommend that further language be added to specify official notice procedures and to ensure the employee is fully aware of her/his appeal rights. Additional problems we have with chapter 4 follow:

Section 2b

--Is the employee given advance notice before action is implemented? Also, 15 calendar days for an appeal seems unrealistic. We recommend that time provided for an appeal be extended to 30 calendar days.

Section 6c

--The section as written could be interpreted to mean that employees who choose a non-GAO representative would not be granted a reasonable period of time to present their application, etc. We do not believe this is intended by the regulation and suggest that the sentence containing parentheses be clarified by changing it to read, ". . . and the employee and his/her representative (even if the representative is employed by GAO) shall be granted a reasonable. . ." Also, the last sentence should be expanded by adding the following to the end, ". . . but does not have the right to review audit procedures and results."

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

January 22, 1981

TO : Director, Personnel System Project
- Charles Schuler

FROM : Chair, CLC Personnel Legislation
Ad Hoc Committee - Len Baptiste



SUBJECT: Amendment to CLC's January 16, 1981
Memo Concerning Draft GAO Order
2511.1, Classification

Our comments to Draft GAO Order 2511.1 (see attachment) contained a typographical error which we would like to amend. This error can be corrected by deleting the word "not" in the last sentence of the memo. By doing this the quoted section of the sentence should read, "... but does have the right to review audit procedures and results."

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 29 1981

TO : Director, Civil Rights Office - Alex Silva

FROM : Chairperson, Career Level Council - Bob Lewandowski

Bob Lewandowski

SUBJECT: Discrimination Complaint Process

As always, we welcome the opportunity to comment upon GAO orders. In the case of Interim Order 2713.2 (A-81), Discrimination Complaint Process, we are in basic agreement with its provisions, but one requirement gives us some concern. The section on Pre-Complaint Counseling (Chapter 1, paragraph 4 (g)) directs the counselor to submit a written report to the CRO Director on the resolution of informal complaints. This report must contain the names of the employee/applicant and the parties contacted.

This required disclosure, in writing, of parties involved in pre-complaint counseling negates the benefits of what was intended to be an informal complaint process. Creating a record of the parties involved in this procedure has already deterred some employees from attempting resolution of discrimination problems via CRO counseling. The CLC believes that, if names of all parties involved in a pre-complaint counseling were omitted from written reports, thus ensuring anonymity, the informal complaint procedure would be a viable and functioning catalyst for exploring and resolving employees' concerns with civil rights.

We will be happy to discuss this further with you. Our representative, Len Baptiste, is available at 633-0145 to answer any questions.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

MAY 5 1981

TO : Chairperson, Career Level Council - Bob Lewandowski

FROM : Director, Civil Rights Office - Alex Silva



SUBJECT: Discrimination Complaint Process

I want to thank the Career Level Council for its recent comments on the interim GAO Order on the subject. You focused on a part of the process which also caused me concern and we've taken steps to fix it.

The final order will not require a Civil Rights Counselor to submit written reports to me or anyone about the specifics of their counseling activities. This information should remain privileged between the counselor and the employee, until such time as the employee may file a formal complaint. At that time, a counselor's report will be requested.

If during the counseling stage the issues are informally resolved under some type of agreement that should best be put in writing, it will be signed by the counselor, counselee, and any manager(s) or supervisor(s) directly involved in implementing the agreement. A copy would be retained by each signatory for a maximum of 120 days after which time the case will be considered closed. No copies of the agreement would be provided to anyone other than the signatories, and that includes my office.

You should also be aware that we have raised the issue of counselee privacy in regard to the GAO Personnel Appeals Board regulations. Under Subpart C (oversight procedures) section 28.33(a)(3) the Board may require that GAO provide "monthly reports of pre-complaint counseling and of pending complaints, in a manner prescribed by the Board" (emphasis added). Conceivably, this could take the form of the reporting requirement the CLC objects to. As an alternative we are recommending to the Board that any oversight reports be required on a quarterly, not monthly, basis, with the form of the report to be mutually agreed upon by GAO and the Board.

If the Board for some reason isn't inclined to accept our recommendation I hope I can feel free to call on you to support the GAO position.

Again, I appreciate the CLC interest in the activities of the Civil Rights Office.

CAREER LEVEL COUNCILCOMMENTS ON PERSONNEL APPEALS BOARD'S
PROPOSED RULES FOR ORGANIZATION AND PROCEDUREHEARING FEBRUARY 26, 1981

The Career Level Council welcomes this opportunity to comment on the Personnel Appeals Board's proposed rules for organization and procedure. We are pleased with the overall content of the rules as they now stand. We are in particular agreement with the Board's interpretation of its own authority and jurisdiction under the GAO Personnel Act of 1980. We concur with the Women's Advisory Committee's analysis of the philosophy underlying the regulations. Furthermore, we find this presentation of the rules to be clearly written, informative and therefore useful to career level staff. We hold comment on the individual provisions of the rules until the written comment period following publication in the Federal Register.

Thank you.

UNITED STATES GOVERNMENT

GENERAL ACCOUNTING OFFICE

Memorandum

APR 22 1981

TO Personnel Appeals Board, GAO

FROM Chairperson, Career Level Council - *Bob Lewandowski*
Bob LewandowskiSUBJECT: General Accounting Office Personnel Board, Organization
and Procedures

The Career Level Council welcomes this opportunity to comment on the Personnel Appeal Board's interim rules for organization and procedure as published in 46 Federal Register 15857, March 10, 1981.

We are pleased with the overall content of the rules as they now stand. We are in particular agreement with the Board's interpretation of its own authority and jurisdiction under the GAO Personnel Act of 1980. As we noted in the hearing held on February 26, 1981, we concur with the Women's Advisory Committee's analysis of the philosophy underlying the regulations presented in its testimony at the hearing. Review of the GAO Personnel Act of 1980 and its legislative history confirms that the Personnel Appeal Board was created to fill the void left by GAO's departure from the executive board's personnel system. The powers of the Board must, therefore, be similar to the powers exercised by those agencies it replaced. Consequently, those powers must include the authority to develop standards and provide guidance via the issuance of prospective regulations. Guidance is especially crucial concerning labor management relations since GAO is making its first comprehensive effort to create a labor management system in accordance with the statute.

Furthermore, we find this presentation of the rules to be clearly written, informative, and therefore, useful to career level staff.

Should you wish to discuss this position further, please contact our representative, Len Baptiste, at 633-0145.